DOCUMENT RESUME

ED 147 310 95 SP 011 997

AUTHOR	Koff, Robert H.; And Others
TITLE	Commissioned Papers of the Illinois Policy Project: Accreditation, Certification and Continuing Education.
SPONS AGENCY	Illinois State Office of Education, Springfield.; National Inst. of Education (DHEW), Washington, D.C.; Roosevelt Univ., Chicago, Ill. Coll. of Education.
PUB DATE	Sep 76
CONTRACT	400-76-0018
NOTE	213p.; For related documents, see SP011 995 and ED128 346
EDRS PRICE	MF-$0.83 HC-$11.37 Plus Postage.
DESCRIPTORS	*Accreditation (Institutions); *Conference Reports; *Educational Policy; *Policy Formation; *Professional Continuing Education; *Teacher Certification

ABSTRACT

The papers contained in this document were commissioned for presentation to the Illinois Project on Accreditation, Certification, and Continuing Education, designed to define issues, analyze procedures, and make recommendations to the Illinois State Board of Education and a national audience of educators and policy makers. Two papers (Arnstein, Wiley and Gore) review current issues in accreditation and certification at the national, state, and interstate levels, and outline topics for future investigation. These papers were prepared for submission to the Phase One Conference devoted to the identification and articulation of policy issues. The Florio paper summarizes results of that conference, detailing the sub-issues in each of the major areas of concentration. Phase Two of the Project involved the formation of three task forces to explore issues defined in Phase One and make policy recommendations concerning those issues to the Illinois State Board of Education, and other interested publics. Three papers (Bentz, Hazard, and Stiles) were commissioned for this phase, and they help to clarify for task force members the background information on accreditation/program approval, certification, and continuing education within the social, legal, and political policymaking arenas in which they exist. Phase Three of the Project consisted of a national dissemination conference coinciding with the final draft recommendations and reports of the three task forces. Comments at the Dissemination Conference prompted the commission of the Levin paper, which examines, in detail, a variety of economic variables affecting accreditation certification and continuing education. In addition it describes procedures that can be taken to carry out the accreditation/program approval functions from a cost-utility analysis perspective. (MJB)

Documents acquired by ERIC include many informal unpublished materials not available from other sources. ERIC makes every ffort to obtain the best copy available. Nevertheless, items of marginal reproducibility are often encountered and this affects the uality of the microfiche and hardcopy reproductions ERIC makes available via the ERIC Document Reproduction Service (EDRS). DRS is not responsible for the quality of the original document. Reproductions supplied by EDRS are the best that can be made from he original.

ED147310

[redacted]

ILLINOIS POLICY PROJECT:
ACCREDITATION, CERTIFICATION, AND CONTINUING EDUCATION

PREPARED FOR THE
NATIONAL INSTITUTE OF EDUCATION

U.S. DEPARTMENT OF HEALTH
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

ROBERT H. KOFF
ROOSEVELT UNIVERSITY

DAVID H. FLORIO
NORTHWESTERN UNIVERSITY

JOSEPH M. CRONIN
ILLINOIS OFFICE OF EDUCATION

SP011997

EVANSTON, ILLINOIS
1978

COMMISSIONED PAPERS OF THE ILLINOIS POLICY PROJECT:
ACCREDITATION, CERTIFICATION, AND CONTINUING EDUCATION

Project Sponsors: The Illinois Office of Education
The College of Education, Roosevelt University

Project Operation: School of Education, Northwestern University

Robert H. Koff, Dean
College of Education
Roosevelt University

David H. Florio
Project Consultant
School of Education
Northwestern University

Joseph M Cronin
Illinois State Superintendent
of Education

The Illinois Policy Project on Accreditation, Certification, and Continuing Education is funded under provisions of a contract with the National Institute of Education, Washington, D.C., Contract Number 400-76-0018. Views and conclusions contained herein are not to be ascribed as the positions of the National Institute of Education, Department of Health, Education, and Welfare.

Evanston, Illinois
September 1976

Foreword

The Illinois Policy Project: Accreditation, Certification, and Continuing Education was initiated and sponsored jointly by the Illinois Office of Education and the College of Education, Roosevelt University. The inquiry was supported under provisions of a grant from the National Institute of Education (Contract No. 400-76-0018) and was operated from the School of Education, Northwestern University.

The Project was designed to function in three phases. During each phase individuals were asked to contribute papers to help examine and synthesize issues and problems that surfaced in Project conference deliberations. This book of readings contains the commissioned papers of the Project.

Educational policymaking in the areas of accreditation, program approval, certification and continuing education is complex, highly political, and in pressing need of clarification. The Project Staff wishes to thank the contributing authors: George E. Arnstein, Susan K. Bentz, David H. Florio, William R. Hazard, Henry M. Levin, Lindley J. Stiles, Deane W. Wiley and Joseph S. Gore for their scholarly efforts in reviewing and synthesizing policy issues and procedures. The expert knowledge of the authors greatly aided Task Force members and Project staff in interpreting existing educational policy legislation and identifying future concerns within a social, political, legal, and economic context.

Robert H. Koff
Project Co-Director
College of Education
Roosevelt University

David H. Florio
Project Consultant
School of Education
Northwestern University

Barbara L. Schneider
Project Research Assistant
School of Education
Northwestern University

TABLE OF CONTENTS

Page

FORWORD.. i

TABLE OF CONTENTS.. ii

INTRODUCTION... 1

Chapter 1. "Teacher Certification: Is It an Art or a Science?"
George E. Arnstein.............................. 4

Chapter 2. "Historical Background: State of Illinois Processes and Structure of Certification and Program Approval in Professional Education."
Susan K. Bentz.................................. 33

Chapter 3. "Accreditation and Certification Policy Issues in Professional Education."
David H. Florio................................. 46

Chapter 4. "Institutional Accreditation and Teacher Certification: Notes on the State of the Law."
William R. Hazard............................... 62

Chapter 5. "Accreditation, Certification and the Economics of Information."
Henry M. Levin.................................. 119

Chapter 6. "National and Regional Accrediting for Professional Education Programs."
Lindley J. Stiles............................... 152

Chapter 7. "Certification and Accreditation in Illinois: Some Comments and Considerations."
Deane W. Wiley and Joseph S. Gore............... 185

INTRODUCTION

The Illinois Policy Project on Accreditation, Certification, and Continuing Education was designed to define issues, analyze procedures, and make recommendations to the Illinois State Board of Education and a national audience of educators and policy makers at the state and national levels of educational decision making concerning educational policy. The specific areas of concentration were teacher (and other school personnel) certification, national professional education accreditation, state approval of education programs preparing certified school personnel, and continuing education as related to certification and employment. Recognizing the interstate and national significance of these issues, the Project also examined broader policy issues related to the various intergovernmental relationships surrounding accreditation, certification, and continuing education.

The Project was structured in three phases:

Phase One. Phase One was a national invitational conference held during October 1975 that identified and articulated the following policy issues: (a) voluntary national accreditation of schools, colleges, and departments of education, (b) state approval for programs designed to prepare school personnel, (c) certification of professional school personnel, and (d) continuing education of school-based education personnel, particularly teachers. This policy issues conference laid the foundation for the policy areas that were then examined in Phase Two.

The Phase One Conference included people from locations throughout the country with expertise in accreditation, certification, governance, teacher preparation and evaluation, accountability, governmental relations, legislation, and other areas affecting institutional licensing processes. Participants also included representatives from the organized teaching profession (state and national), the Illinois Office of Education, the National Institute of Education, the U. S. Office of Education, schools, colleges and departments of education and the state legislatures.

Conference participants were asked to react to the Arnstein paper, "Teacher Certification: Is It an Art or a Science?" and the Wiley and

Gore paper, "Certification and Accreditation in Illinois: Some Comments and Considerations." These papers reviewed current issues in accreditation and certification at the national, state, and interstate levels and outlined additional topics for future investigation.

Results of the conference were summarized in the Florio paper, "Accreditation and Certification Policy Issues in Professional Education." This paper detailed the sub-issues in each of the major areas of concentration. These three papers and conference dialogues were used to define the specific charges to the task force groups that were organized for the second phase of the Project.

Phase Two was designed to have three task force groups explore issues defined in Phase One and make policy recommendations concerning those issues to the Illinois State Board of Education, professional and labor related education groups, interstate organizations, legislatures, appropriate federal agencies, accrediting agencies, and other interested publics. The three task forces were organized as follows: The Certification Task Force explored issues and made recommendations about the certification of teachers and other professional school personnel. The Accreditation/Program Approval Task Force dealt with policy issues concerning both national voluntary professional education accreditation and state program approval of training programs for school personnel. The Task Force Committee on Continuing Education examined issues of professional development for school personnel, including the relationship of continuing education with certification and continued employment and state financing of continuing education.

The Bentz paper, "Historical Background: State of Illinois Processes and Structure of Certification and Program Approval in Professional Education," the Hazard paper, "Institutional Accreditation and Teacher Certification: Notes on the State of the Law," and the Stiles paper, "National and Regional Accrediting for Professional Education Programs" were commissioned for Phase Two of the Project. These papers helped to clarify for task force members the background information on accreditation/program approval, certification and continuing education within the social, legal, and political policymaking arenas in which they exist.

Phase Three of the Project was organized to coincide with the final draft recommendations and reports of the three task forces. A National Dissemination Conference was held in May 1976 to provide a preliminary critique of task force documents. The Dissemination Conference was designed so that a variety of individuals from different backgrounds could review and make comments on the drafts of the task force reports. Those reviewing the reports were educational researchers, teacher educators, community representatives, and school personnel. Task Force chairpersons revised and edited their documents as a result of input comments received from Dissemination Conference participants.

Comments at the Dissemination Conference by various participants prompted the commission of the Levin paper, "Accreditation, Certification, and Economics of Information." This paper examines, in considerable detail, a variety of economic variables that affect accreditation, certification, and continuing education. In addition, the paper describes procedures that can be taken to carry out the accreditation/program approval functions from a "cost-utility" analysis perspective.

The Task Force Report* has been prepared for dissemination to the Illinois State Board of Education, the National Institute of Education, accrediting agencies, professional scholarly and labor affiliated education organizations, and other interested publics. The Report contains a summary of issues, specific policy and legislative recommendations, a review of educational research on teacher training and teacher effectiveness, and a review of statutory, case and constitutional law affecting certification and program approval.

A Project Final Report is being prepared and will be disseminated in fall 1976. The Final Report will contain: (a) a Project history; (b) a review and synthesis of policy issues; (c) comments concerning the social, legal, and political/contextual forces affecting policy in the topical areas; (d) recommendations for action; (e) topics requiring further inquiry; (f) suggestions for continued dialogue, collaboration, and communication on the issues; and (g) a comprehensive bibliography.

---

* Koff, Robert H., Florio, David H., and Cronin, Joseph M. The Illinois Policy Project Task Force Reports. School of Education, Northwestern University, Evanston, Illinois, 1976.

CHAPTER 1

TEACHER CERTIFICATION: IS IT AN ART OR A SCIENCE

George E. Arnstein

This paper was prepared for Phase One of the Illinois Policy Project. Consequently, its' purpose was to highlight some of the pressing problems facing accreditation and certification policymaking. The author has identified and examined issues and clarified relevant terms, e.g., accreditation, certification, state program approval, etc. The purposes of accreditation and state program approval, and role responsibilities, political control, and evaluation of teacher performance for certification are examined.

Perhaps one of the greatest difficulties with accreditation can be directly attributed to the definition and use of terms. Accreditation is a private voluntary process whereas certification is the responsibility of the State and does not necessarily have anything to do with accreditation. State program approval is granted by a State agency charged with issuing teaching certificates. It is, therefore, a state function to approve specified courses/programs designed to provide training for individuals for public school roles.

Accreditation, the author maintains, is one indicator of institutional or program quality. Required accrediting procedures (e.g., self studies, reports, etc.) can be beneficial to institutional self improvement. The author also discusses problems associated with the purpose/function of accreditation. He concludes that accreditation is being used for purposes for which it was never intended.

State program approval is directly tied to the certification of teachers. An institution with a state approved program can almost guarantee its students that they will be credentialed. A national voluntary accreditation agency however does not have credentialing authority and, as a consequence, it is often viewed as being unable to effectively apply sanctions. That is, even though a teacher education program may not be accredited, it could be approved by the state. Hence, program graduates could receive a credential either through the program approval or direct application method.

The State has the responsibility for licensing. Although not dependent on the dues of its approved members, it is subject to political and social pressures. These political constraints can impede the State from being an adequate quality control mechanism for monitoring programs training education personnel.

The author concludes his paper by examining political issues and practical problems associated with determining professional competence. The political issues affecting certification include questions of redistributing power, authority, and responsibilities. The organized teaching profession is seeking to control training, admission, and dismissal from the teaching profession. The State awards the certificate but how the State awards and who should exercise policy making authority over this process are being seriously questioned by the teaching profession, training institutions, and community groups. The evaluative criteria used to ascertain professional competence further complicates the certification process. The author makes the point that there is no recognized or empirically tested set of skills, techniques, or knowledge which can be shown to reliably identify a "qualified" teacher.

Teacher Certification:
Is It an Art or a Science?

George Arnstein *

A Few Words of Clarification

At least some of the difficulties in today's controversy can be avoided because they derive from confusion rather than deliberate confrontation.

Accreditation is a private voluntary process which covers most of American postsecondary education.

Certification is the responsibility of the State and need not have anything to do with accreditation. The certification of teachers means that the State issues a credential, valid for a stipulated period. It is a license although I prefer to avoid this word because there also is

Institutional Licensing, permission granted by the State to a school or college to operate (clearly different from the licensing of individual teachers).

A State charter used to be the permission granted by the State for a college to operate. Charters, often granted in perpetuity, have sometimes been abused so that some States now superimpose an institutional license as a condition for the conferral of degrees (thus making the charter, de facto, obsolete).

State approval (also known as registration) is conferred by the State agency, usually charged with the certification of teachers, as a means of approving specified courses or programs. In the present paper references

---

* Executive Director, National Advisory Council of Education Professions Development

typically are to State approval of teacher education programs; most States also have a separate State approval agency, designated by the governor, for the approval of programs for veterans under the G. I. Bill (which is not covered in the present paper).

Teacher Certification: Neither an Art nor a Science

The phrase increasingly in use in business is The Bottom Line; either it is in the black or it isn't, and that's what business is all about.

For our purposes, the bottom line is the teaching credential, the piece of paper which certifies that a student has crossed the magic line and has been certified by the State as a member of the profession, fit to be hired and suitable for use in the classroom. The certificate is the direct descendant of the medieval licentia ubique docendi, awarded by authority of the university which, in turn, operated by charter of the Emperor or the Pope.

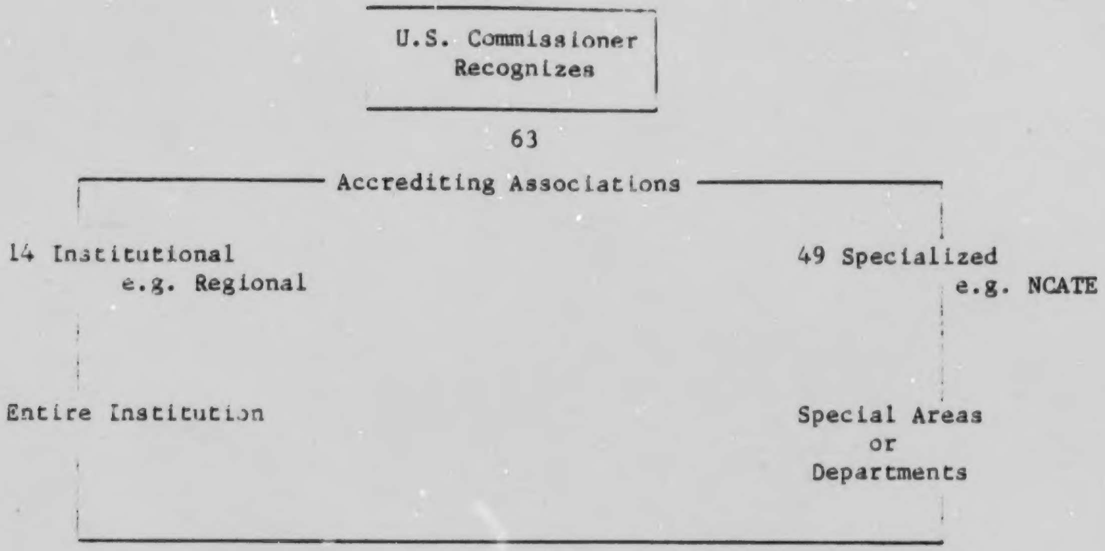
In practice, the state may issue the credential or it may delegate the authority, de jure or de facto, to certain colleges with socalled program approval. The delegation to the college is of pivotal importance.

Accreditation, in Short (Figure A)

Surprising as it may seem, we can take the matter of private voluntary accreditation and treat it separately. While accreditation is not completely separate--the separation varies from state to state--it does form a subsystem of its own, not directly related to certification.

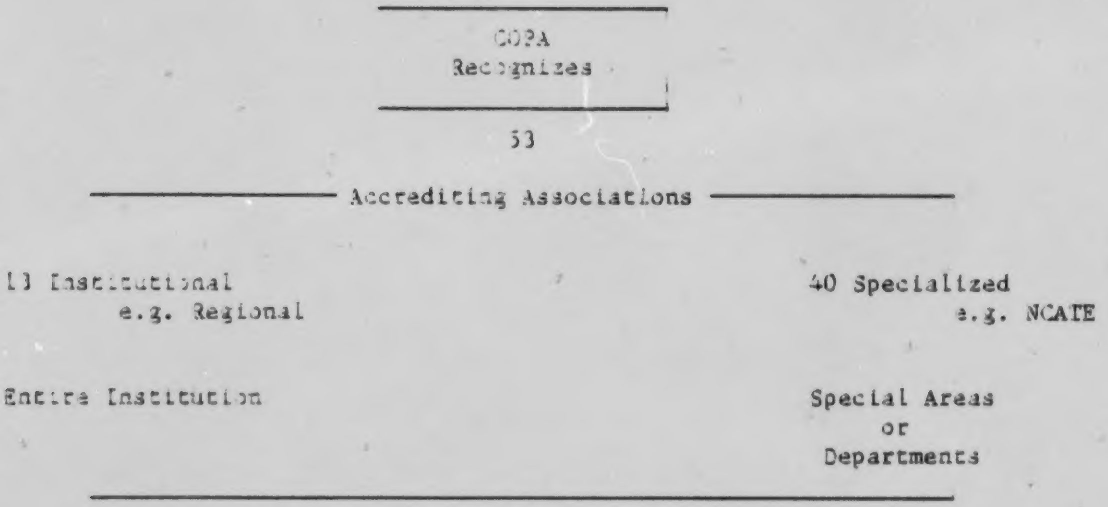
Accreditation is a peculiarily American invention. It also exists in Canada and in a few zones of American influence but it is basically American. It has two major forms: Regional or institutional accredita-

Figure A


U.S. Commissioner Recognizes
63
Accrediting Associations
14 Institutional
e.g. Regional
49 Specialized
e.g. NCATE
Entire Institution
Special Areas
or
Departments

Accreditation is intended to help students

Figure A (1)


COPA Recognizes
53
Accrediting Associations
13 Institutional
e.g. Regional
40 Specialized
e.g. NCATE
Entire Institution
Special Areas
or
Departments

Accreditation is intended to help students tion which deals with a college as a whole; it does not claim that all parts of the college are equally good, or even that all parts are of acceptable quality. It does suggest that the college, by virtue of accreditation, is making better progress than it might otherwise.

Specialized accreditation, by agencies like the National Council for Accreditation of Teacher Education, typically requires regional accreditation as a prerequisite. This relieves NCATE, for example, of having to look at the rest of the college except insofar as it impinges on teacher education (or whatever program NCATE is reviewing.) NCATE also insists on prior State approval.[1]

Both of these forms of accreditation are voluntary and private. They are only indirectly related to the Federal government, again voluntarily, through something known as Recognition.

> ...the Commissioner of Education shall publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution.[2]

The historic major regional associations are so recognized. So is NCATE, although its most recent recognition was subject to some interesting stipulations and qualifications.

While NCATE and some 48 other accrediting bodies are recognized as being reliable authority as to the quality of training offered, in fact they are not reliable. This conclusion, among others, emerged from Private Accreditation and Public Eligibility[3], a report to the U. S. Office of Education from the Brookings Institution and the National Academy for Public Administration, better known as the Orlans report, named after the principal investigator, Harold Orlans. I am one of the co-authors of the report and I agree that accreditation is not reliable authority as to quality. NCATE, for example, permits the unexamined rise and decline of entire programs during the ten years which elapse between reviews.

Strangely enough, this need not necessarily affect certification, because accreditation and certification are separate, although in practice state and other officials do look at the results of accreditation. More than half of the states accept NCATE accreditation in the sense that they issue teaching credentials on the strength of a recommendation by an NCATE-accredited college.

To be critical of accreditation and its shortcomings does not mean that accreditation ought to be eliminated. Accreditation is one indicator of quality; the various self-studies and reports connected with accreditation processes can be valuable. Typically these studies and reports are not public documents and this impairs their utility.

The weakness of accreditation is that it antedates its use as a determinant of eligibility for Federal programs, that it is being used for purposes never intended, and that we tend to attack accreditation for failing to serve our present day purposes. This is palpably unfair, a little bit like hailing a cab to haul a shipment of gravel and then to complain that it is most unsuitable as a truck.

We can reject accreditation if we wish; we then must confront the question of whom we wish to have discharge those functions now being performed by the private voluntary accrediting agencies.

State Program Approval

Having emphasized private, voluntary accreditation, I must admit that there are some State agencies which refer to themselves as accrediting bodies and which perform functions which are rather similar to those being performed by private, voluntary accrediting bodies. Foremost is the Board of Regents of the University of New York, a State body which charters institutions of higher learning, thus issues institutional licenses. It also is recognized by the U.S. Commissioner of Education as an accrediting agency, for higher education, the only State agency so recognized. The recognition has some ambivalence, however, because some forms of accreditation by the NY Regents fail to be listed in the official USOE *Higher Education* directory. Take Rockefeller University, for example, accredited by the Regents, but listed in the OE Directory as not accredited at all. RU is of sufficient prestige not to have to worry about such minor omissions, but for three (or more) consecutive editions the OE Directory has continued the erroneous omission.

Several other State agencies also would like to be recognized by the U.S. Commissioner as accrediting agencies, but have not been so recognized. The result is confusing: The Maryland State Department of Education "accredits" colleges. There is an Indiana Private School Accrediting Commission, also without recognition. And there are some fraudulent self-appointed private accrediting bodies, without recognition, which have been known to accredit some real diploma mills,[4] thus confusing the picture further.

Worse yet, there is the new Council on Postsecondary Accreditation, (Figure A(1)), the respectable successor to the respectable National Commission on Accrediting and the respectable Federation of Regional Accrediting Commissions of Higher Education. COPA also recognizes private voluntary accrediting associations, but its list of 53 recognized bodies differs from those recognized by the U. S. Commissioner. Thus the word "recognized" is not self-explanatory and adds to the confusion.

What we do have in teacher education is the common use of something termed "State approval" or "program approval," analogous to private accreditation. The widely accepted guidelines[5] have been prepared under the auspices of the National Association of State Directors of Teacher Education and Certification and they do much to stabilize a system which links the non-State function of teacher preparation with the State function of certification.

Obtaining the Teaching Certificate

In simplified terms, a teaching certificate may be obtained in most states by two methods (Figure B):

* Individual application by the candidate to the State certification agency which will review and evaluate his preparation, prior to issuing (or refusing) the certificate.

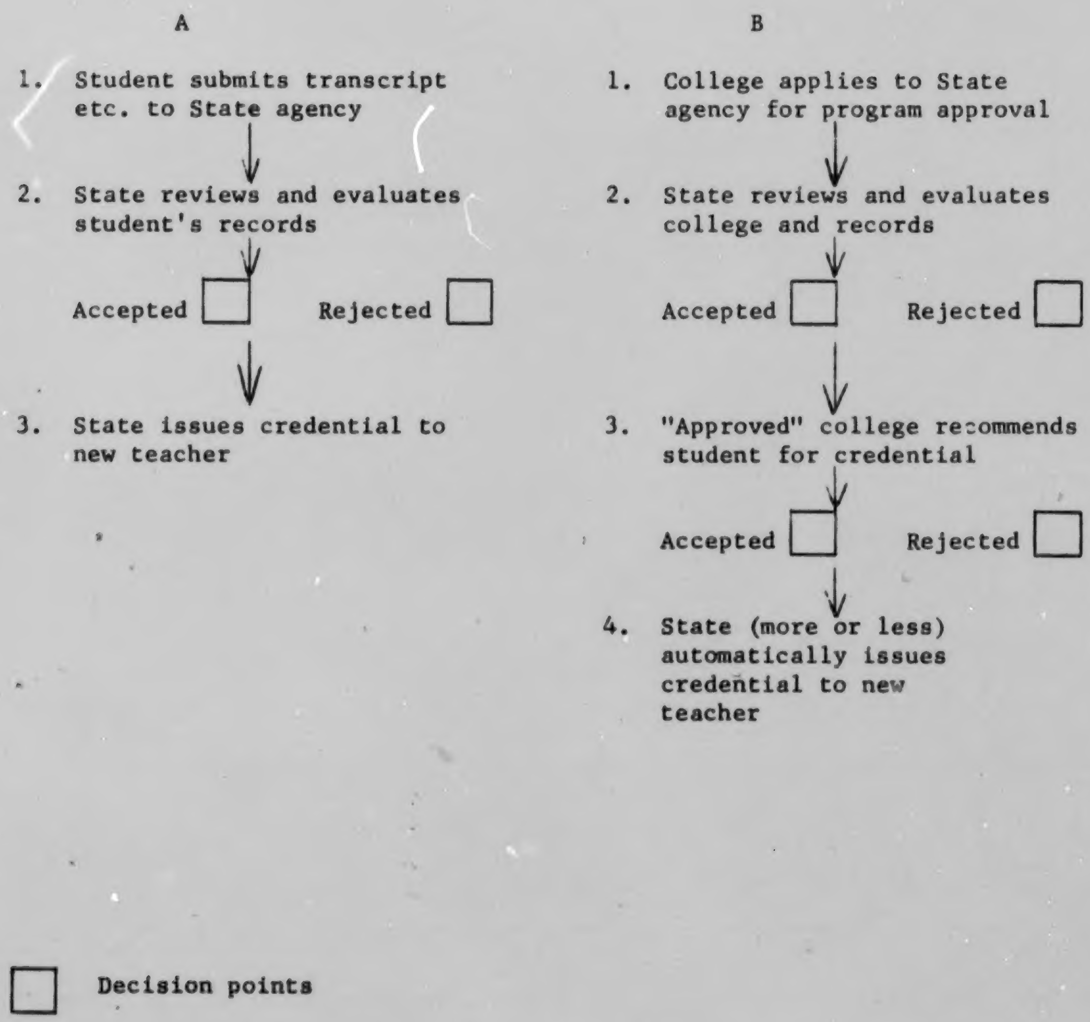
* Completion of a State-approved sequence of teacher preparation, with the approved college recommending issuance of the credential. In some States the college de jure issues the credential. In others its recommendation is tantamount to certification.

State approval is of pivotal importance because there is no argument that the State is responsible for certification of teachers, that the State can delegate its authority, in whole or in part, and that the prevailing practice is for most States to delegate this power to "approved" institutions of higher learning.

The delegation of approval is based on a process which is rather similar to private, voluntary accreditation: The institution preparing

Figure B

Two Approaches to Obtain a Teaching Credential


A
1. Student submits transcript etc. to State agency
2. State reviews and evaluates student's records
Accepted ☐
Rejected ☐
3. State issues credential to new teacher
B
1. College applies to State agency for program approval
2. State reviews and evaluates college and records
Accepted ☐
Rejected ☐
3. "Approved" college recommends student for credential
Accepted ☐
Rejected ☐
4. State (more or less) automatically issues credential to new teacher
☐ Decision points

teachers writes a self-study and submits it to the appropriate State agency. Then comes a visiting team for a site visit, a set of recommendations based on the site visit and other evidence, and the State decides on program approval or rejection.

Approval typically runs for five years and is contingent on periodic reports by the college of any material changes in programs, faculty, or policies.

The State theoretically makes its own decisions, through its own staff, plus outside members of the visiting teams, sometimes by using some kind of a State Board of Education or, as in California, a special commission on teacher certification. In practice, the State visiting team very much considers the findings of NCATE, the findings of the regional accrediting teams and associations, and typically coordinates the State approval visit with the NCATE voluntary accrediting visit. Since most private accrediting bodies--including NCATE--treat the reports as confidential, to be released only by the President of the college, this raises interesting questions as to how persons acting for the State get to read reports not otherwise available. Further, do these private reports then become public documents, since they are part of the "evidence" used by a public, State agency.

In theory NCATE is not needed. In practice, State agencies would see an increase in their workload, their costs, and would find their work more narrowly based than they do now, at least for those institutions which have applied for private accreditation.

Conversely, NCATE also benefits from the cooperative relationship because the typical NCATE team is joined by one or more representatives of the State whose collected data and impressions enrich the scope of the NCATE visit. To be sure, not all visits are so coordinated and it is a frequent complaint of colleges that as soon as one team has left, they must prepare for the next invasion. The cost to the institution is not only financial (visitors must be fed, housed, and reimbursed for travel); in addition it takes hundreds, even thousands of hours of faculty time to write the reports, chaperone the visitors, answer their questions, and sometimes construct entire Potemkin villages.

NCATE, of course, is voluntary, and so is the pursuit of State approval. NCATE actually is much more dispensible than program approval, as demonstrated by the existence of some 1400 institutions which prepare teachers. Of these 850 belong to the American Association of Colleges for Teacher Education and only 540 belong to NCATE.[6] There are colleges which do not seek NCATE membership, apparently without loss in status, as juxtaposed to schools which used to be accredited but have lost their accreditation, in whole or in part.

Program approval also is voluntary but the benefits are highly visible: A college with approved programs can virtually promise its students that they will be credentialed, that their application will be simplified, and that the State has in fact inspected and _approved_ whatever programs the college submitted to this kind of inspection. By virtue of this approval, the college becomes the _de facto_ agent of the State in issuing the credential.

NCATE is not in a strong position to apply sanctions or even standards because it can survive only if it has a reasonably large number of dues-paying members. Stiles and Bils point out what risks private accrediting agencies run:

> Were NCATE really to refuse accreditation to weak institutions, as it purports to do, it might soon be out of business. People would reject the accrediting agency rather than admit that their own institutions are weak. Thus national accrediting may confront an unresolvable dilemma: If it is true to its mission, it may destroy itself.[7]

The Federal Threat

In the area of certification, there is no visible Federal activity or threat. The charge could be raised that the Federal agencies are neglectful, that they have failed to provide significant funds to improve certification or to facilitate the setting of standards, that they have put trivial amounts of money behind the Interstate project ($50,000 per year is about the size of it) when the need is evident and great.

As beneficiaries of the certification process, Federal agencies have played an essentially dependent role. While the Department of Defense operates a vast overseas dependents school system (about the tenth or twelfth largest American school "district") it follows a hiring policy which calls for two years of domestic teaching experience and the holding of a regular State certificate.

As for accreditation, there is a major Federal role, prescribed by law, in having the U. S. Commissioner of Education recognize certain accrediting bodies. As indicated earlier, this is now up for discussion, aggravated by the scandals in the Guaranteed Student Loan Program (and others), but peripheral to the matter of certification because accreditation is and should be a voluntary, private activity. The fact that the U. S. Commissioner has given NCATE only a one-year recognition may be interesting, may stimulate some interesting questions, but leaves the

State certification officers free to do what they have been doing right along. Instead of a Federal threat, there are those in the accreditation field who worry much more about the possible actions of the States (as voiced, for example, by Robert Kirkwood, the former head of FRACHE).

The Search for Paternity

The system of State approval includes an interesting superstructure: The Interstate Compact. With more than 30 States now subscribing, and with Federal support derived from EPDA (Title V, HEA 1965), the Compact lends added strength to its members who enjoy various kinds of reciprocity in certification. The Compact also strengthens the hand of the colleges because it discriminates in favor of those teachers who took their preparatory work at State-approved institutions.

Operationally, the Interstate Compact could be said to turn the Code Napoléon on its head. Section 340, promulgated in 1804, said, "La recherche de la paternité est interdite." But the Interstate insists that la recherche de la paternité est obligatoire, for how else can a certification officer discriminate between those out-of-state teachers who are to enjoy reciprocity automatically as juxtaposed to those who must furnish further proof. Automatic certification derives from having completed a program at a State-approved institution, while those applicants who sought certification directly from the State must not only have a certificate but also three years of specified and recent teaching experience.

The Interstate Compact, legally and operationally, establishes two classes of teaching certificates, although the distinction may be lost to the innocent bearer. In New York, for example, the better, stronger, reciprocal certificate is printed on blue paper; the inferior, direct access certificate is printed on white paper.

As for Pennsylvania, the direct access route is essentially dead: Applicants to the State body are referred to the State-approved college of their choice where the credits will be reviewed, for a fee, and assessed. The Commonwealth has delegated all of its authority to the various colleges.

The State approving agency is not dependent on the dues of its approved members. It is, however, subject to political pressures as exemplified in the following conversation which occurred outside the hearing room of the Senate Subcommittee on Education on July 17, 1975. (Some names have been omitted because the purpose of the anecdote is to illustrate, not to attack a particular State or institution):

> State Official: It sure is a shame that the OE people (the Accreditation and Institutional Eligibility Staff) put the ABC College in my State on their eligible list. They shouldn't have done that because the school does not even have a license.
>
> Arnstein: I agree, they shouldn't have done that. That makes them eligible for the Federally Insured Student Loan Program.
>
> State Official: That's what I just told the Senators (in my testimony). We can run a good program at the State level but it becomes harder when the OE does something like that.
>
> Arnstein: By the way, if that college operates without a State license, why doesn't the State shut it down? Then the Office of Education would not mistake it for a legitimate school.
>
> State Official: Well, you know we have this political problem and that makes it kind of tough for us to shut down this particular school.
>
> Arnstein: Even though it lacks a license to operate?
>
> State Official: Yes.

The anecdote is real; it illustrates the hazards of State inspection and quality control. It also demonstrates a lack of professionalism, of strength and of quite a few other shortcomings. The fact remains, however, that the State is responsible for licensing. Even if it delegates this authority to the colleges, or if it relies on NCATE for automatic program approval, these agencies get their delegated authority from the State.

Variations of a State System

In describing the existing system, with its remarkable similarities from coast to coast despite the variations among 50+ jurisdictions, a common characteristic is to temper the authority of the State by creating some intermediaries. While the State may have the last word, the actual operations are conducted by an interrelated grouping of accrediting agencies, colleges (or departments of education), private efforts, and the variable inputs from various professional associations including NCATE, NEA, AACTE, NASDTEC and others. The real question might well be: Why are we, here and now, so unhappy with the system?

The answers to this are at least threefold:

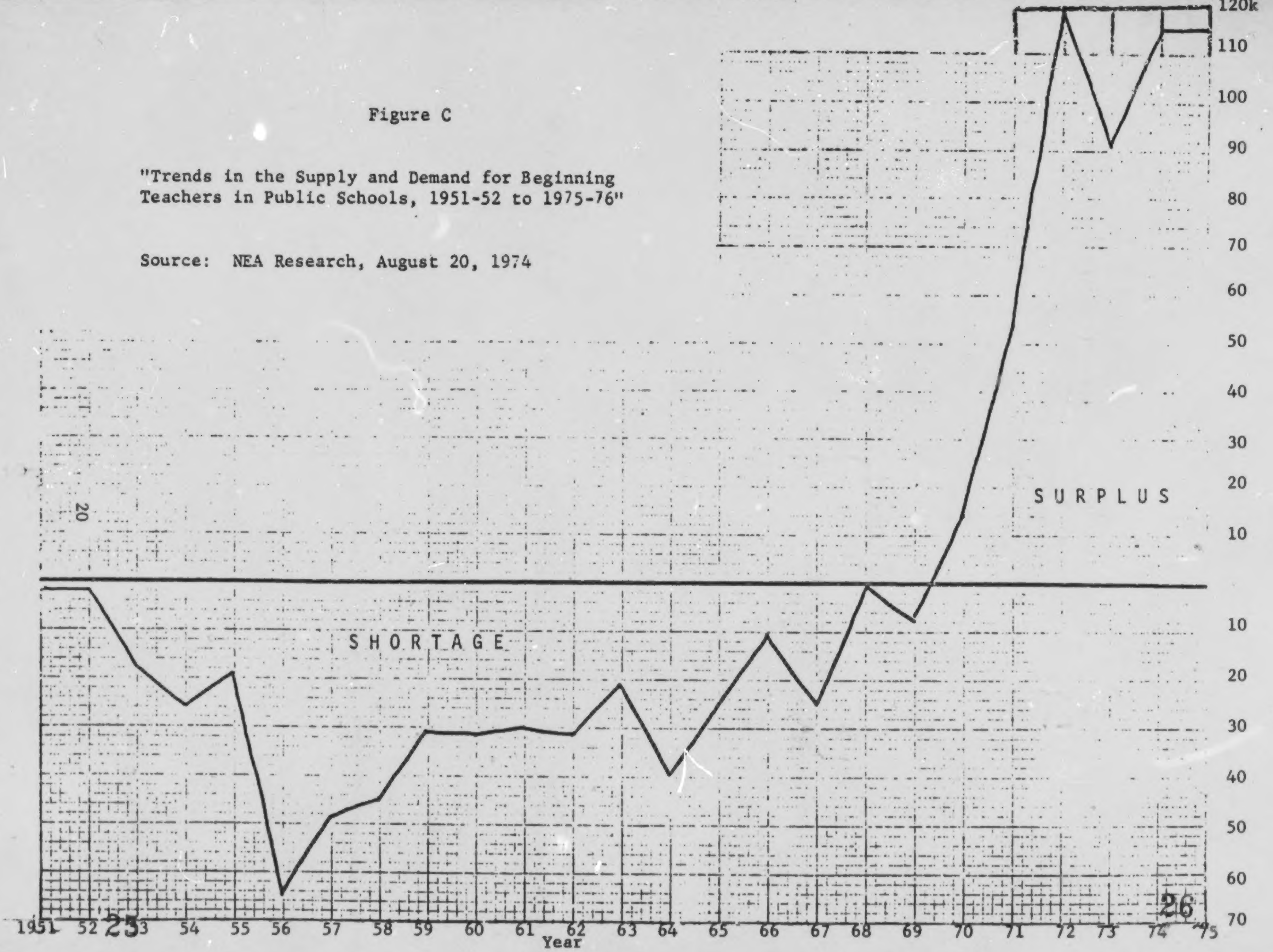
1. The problem is demographic. We used to have a shortage of teachers and we now have a surplus. (Figure C) We used to worry about quantity and now we can afford to worry about quality.

We have built greater capacity for preparing teachers than we now need or will need in the forseeable future. This means somebody ought to be cut back, or cut out, and somebody will get hurt. We are now looking at the rules to see whether we ought to change them so that we can eliminate the truly weak or inappropriate parts and create a stronger, possibly a

Figure C

"Trends in the Supply and Demand for Beginning Teachers in Public Schools, 1951-52 to 1975-76"

Source: NEA Research, August 20, 1974



triage system.

2. The problem is political, not Democrats vs. Republicans, but certain pressures to redistribute power, authority, responsibilities. There is a visible trend for participation by teachers, indicated in part by the rise in trade union activity and the shift in the NEA from a bland organization claiming to speak for all of education into a union-like association speaking for classroom teachers primarily.

Not surprisingly, the organized teaching profession now seeks control over admissions to this profession, a turf long claimed by the teacher educators.

2.1 We might term one aspect of this the philosophical quandary: If teacher educators, i.e. professors of education and their associations, are committed to democratic procedures and are nonelitist, then they will be outnumbered by their former students, the roughly two million teachers who claim to be able to make decisions about teacher preparation and performance with the same confidence as the teacher educators who are numerically so inferior. If the teacher educators claim superior knowledge, and thus the right to make controlling decisions, they must deny the concept of shared decision making, democratic control, and its many corollaries. This is a real philosophical problem which, in our society, would seem to call for demonstrated leadership by teacher educators so that they may prevail through leadership, in ideas and persuasion, not through legislated delegations of State authority.

3. The problem is epistemological because the state of the art of teacher education, and certification, does not permit the assertion of those skills and competencies which every teacher must have, as juxtaposed

to those which have not been identified as being essential to being a certificated teacher. The teaching certificate is evidence of competence, of having mastered a body of knowledge which reflects the standing of a genuine member of a profession.

In fact, this assertion is shaky, debatable, and reduces the argument over quality control to a more political level because the epistemolcgical problems are essentially unsolved. We do not know how to describe the required knowledge of all teachers, and this explains many of our troubles.

This is admitted by just about everybody participating in the process and unwilling to assume the responsibility of asserting something like the Sears Roebuck guarantee: Satisfaction guaranteed or your money back. The participants in the certification process do not want to issue any such guarantee, probably for two reasons: The science of teacher education is not sufficiently advanced to permit any promises as to successful performance, thus it would be immoral to guarantee results. And there is nobody in charge of teacher certification who could be charged with issuing the guarantee.

The Advantages of Certification

Since every State has asserted the certification power, the State has assumed this responsibility. In practice, some States have worked very hard to delegate this power and to get rid of it, at least insofar as the professional content is concerned. States still may exact a $20 fee, a health certificate, a loyalty oath, may bar homosexuals, but they tend to stay away from decision as to the actual performance or competence of teachers about to be credentialed (or recredentialed). Even in those States which have moved toward competence-based teacher preparation, there is an understandable reluctance to spell out the competencies, level of performance and other vital details.

The conclusion is inescapable: Teacher education is not a science, since we do not know how to describe in usable detail a competent teacher suitable for certification. Similarly, we cannot establish meaningful cut-off points to justify certification or refusal of a certificate. The result is a helpful conspiracy, based on an imperfect art, not unlike the paper money we use: The pieces of paper have no intrinsic value, used to be redeemable for gold or silver, but have widespread acceptance as long as we have confidence which makes the whole system workable.

Teacher certification is built on similar illusions. The credential reassures the public, sorts out the members of the profession from the non-members and confers a modicum of status, may in fact be evidence of some aspects of superior or relevant preparation but does not assure it, includes a whole series of hurdles and obstacles which may not be relevant, facilitates placement on a salary schedule, provides leverage for some additional training which is required for renewal, and generally is a visible part of an elaborate mechanism which goes back to the middle ages.

The survival of the teaching certificate today may well be in the public interest. It offers a measure of control over entrants into the so-called profession, provides rules for revocation or elimination, may contribute to a measure of quality control, and serves as a deterrent to patronage and nepotism, especially in those school districts where the hiring officials can fall back on the nasty people in the State capitol who prevent them from hiring an applicant with strong local sponsorship but inadequate professional preparation.

The question should be raised whether we really need a teaching certificate. As matters now stand, about a third of the three million American teachers are not certificated. They teach in private and parochial schools, so-called pre-schools (where there is a current push toward a new certificate, the Child Development Associate, which is to be competence-based), the overwhelming majority of all colleges, in proprietary schools, in the military, industry, and other "informal" schools. In addition, there are thousands of teacher aids, paraprofessionals who do not hold teaching credentials and are not supposed to teach on their own but in fact often perform teaching chores, as reported by Jorie Mark in her recent survey.[8]

Sometimes the requirements for certification (or its omission) is a matter of geography, jurisdiction or accident: Faculty in California community colleges must be credentialed but in most other states they need not be; some states require parochial school teachers to be credentialed while others do not. Clearly there is a powerful tradition at work which insists on teaching credentials in just about all of the public schools, but unwilling to specify with conviction that the credentials stand for a specific set of performance criteria. Even the recent New York 1972 Regents Plan for the Development of Postsecondary Education merely states a goal (thus tacitly admitting that past performance has fallen short of this goal):

> To establish a system of certification by which the State can assure the public that professional personnel in the schools possess and maintain demonstrated competence to enable children to learn.

The preparation of teachers differs from most other forms of American education. It differs from liberal education because a liberal education holds out no promise of job placement or any special competencies while teacher education does. Liberal education can afford to be somewhat amorphous and avoid questions as to performance standards and quality control, something that colleges like Mars Hills and its performance-based curriculum are beginning to find out (and admit).[9]

The teacher college also differs from other professional schools because it awards the degree and (in most cases) also acts for the State in awarding a professional certificate. The college with program approval thus judges its own product according to its own standards as to educational quality; it also represents the public interest in judging the anticipated professional performance on behalf of the State.

Clearly there is a conflict of interests: Professors qua teachers are supposed to be helpful and supportive, to bring out the best in their students and help them in their personal and professional growth. Professors qua agents of the State are supposed to act in the public interest and recommend for certification only those teachers who truly are expected to be competent. The problem was illustrated by a professor from a Western state who participated in the AACTE Leadership Training Institute (August 13-15, 1975, Annapolis, Maryland):

> "We give an 'A' to all of our student teachers."
>
> "Why do you do this? Surely some are better than others, and surely some are less than excellent?"
>
> "Well, we learned that if we give 'B's or anything less than an 'A' the local school districts will not even interview them, now that there are enough applicants."

> "But aren't you abdicating your responsibility to the public, to the children?"
>
> "No, let the school districts do their own sifting and sorting."[10]

What Are the Real Problems?

Several major trends currently coincide and stimulate the discussion as to the future of the teacher education functions in higher education:

1. There is a long-term trend toward increasing and more effective participation by classroom teachers in decision making. Classroom teachers are by far the largest single segment of the education profession and they are asserting their strength. The transformation of the NEA to a labor union is symptomatic.

To exclude or minimize the role of the teachers is perilous because it puts to the test the existing concept of "education profession" and may fragment it, leaving the teachers in charge of the largest surviving segment. Conversely, as members of the overall profession, it is difficult (if desirable) to dislodge educators who, in the words of Edward Pomeroy, used to dominate training, accreditation, and most other aspects of teacher education.[11]

2. The educational enterprise used to be a rapidly expanding "industry" with high birthrates after World War II feeding an unending stream of new customers into the schools which required more teachers trained by more professors. This also was a period of rising standards of living, rising incomes, rising expectations, leaving almost everybody so upwardly mobile that there was little need for fratricidal competition.

Now that the unending escalator has stopped escalating, there is increasing competition and even border warfare. Teacher educators, who used to occupy a central position, feel threatened. Worse yet, some of their cherished assumptions are being challenged, often successfully. AACTE seems to admit this with its 1976 theme: A profession, now or never.

Teachers colleges are facing declining full-time enrollments, loss of confidence, and view the rise of teacher centers as a competitive activity in the realm of inservice education.

3. Federal funds are drying up. While teacher education had never been a major target of Federal funds, it too had benefited from the overall increase in research and development funds, in the educational research activities which began so modestly with the Cooperative Research program under the Eisenhower Administration. Colleges of education also are part of the larger postsecondary world which was enriched with institutional grants, guaranteed loans, subsidized dormitory construction, library facilities, basic opportunity grants, and Fulbright-Hayes awards. The withdrawal symptoms are visible, and the current decline of EPDA may be terminal.

4. The criticism of teacher certification proceeds at two levels: At the core there is the failure of CBTE to produce, at least to date, a set of competencies which could be translated into certification standards. The certificate, when closely examined, stands for no validated set of skills, techniques, knowledge or professional mastery. Since the colleges may be perceived as the custodians of the "content" of the profession, the professional weakness of the teaching certificate reflects badly on the professional educators, whether they hold the credential or play a role in its award.

Secondarily, there is the struggle over control: Who shall award the certificate? To be sure, the legal answer is that the State awards it, but operationally this merely disguises the further question as to how the State awards it: Through a board of education or certification, and who shall sit on the board? Through delegation to the colleges, thus raising the question as to who does the delegating, and why should they keep on delegating this authority?

In some States the classroom teachers are increasingly asking for control over this State process, analogous to the way they increased their control over NCATE.

5. Accreditation, though theoretically not part of the system, is important as a private, voluntary activity, both institutional and in teacher education. To put it bluntly, if there were no accreditation, then questions of Federal eligibility (which have little to do with teacher education in any direct sense of the word) would have to be made on some other basis, which may well be worse or less effective. Worse yet, without accreditation there would be no challenge, no check to the State approval authorities.

The apparent redundancy of the system, the overlapping aspects of accreditation and State approval, may well be worth the price, especially if they were handled more effectively and more rigorously. Neither the States nor NCATE are sufficiently skilled or rigorous in carrying out their self-imposed standards and procedures. NCATE demonstrably does not assure quality. NASDTEC guidelines demonstrably are not being enforced. We could go so far as to say that they are ideals, that the present state of the art does not permit them to be enforced. At the same time it can be asserted that our present knowledge and techniques permit us much better and more thorough evaluations than we are now undertaking. Accreditation is being performed by amateurs, that is professionals in their discipline (Ph.D. in Statistics, for example) but unskilled, untrained part-time volunteers in their capacity of evaluators or inspectors of a course, department or college. We have entrusted quality control to amateurs who practice, usually conscientiously, an art based on checklists which make it a bit scientific (i.e. objective). Operationally the practices of teacher certification, accreditation, and program approval are not a science, and I fail to see what good it does to claim that they are an art.

At the same time they are ready for improvement, based on what we now know and what we can organize rather quickly if we can muster the determination to do so.

The project for which this paper is written should be part of this thrust to a higher and more effective level of teacher certification.

NOTES

1. Standards for the Accreditation of Teacher Education, National Council for Accreditation of Teacher Education, January 1970, reprinted 1975 (p. ii).

2. 38 U.S.C. 1775(a) 3.

3. The report, in abbreviated form, has since been published as Private Accreditation and Public Eligibility, (Lexington, Massachusetts: Lexington Books) 1975.

4. Arnstein, George, "Ph.D., Anyone?" American Education, Volume 10 (July 1974).

5. Standards for State Approval of Teacher Education, National Association of State Directors of Teacher Education and Certification, 1973 Edition (revised).

6. NCATE Annual List, 1974-75.

7. McCarty, Donald J., et al., New Perspectives on Teacher Education, Chapter 9, Lindley J. Stiles and Jack A. Bils, "National Accrediting," (San Francisco: Jossey-Bass Publishers) 1973, p. 112.

8. Mark, Jorie Lester, Training and Utilization of Paraprofessionals: A Study of the Nation's Public School Systems Enrolling 5,000 or More Pupils, unpublished dissertation, University of Massachusetts, 1975.

9. Angus, Edward L., and C. Earl Leininger, "Experimental Learning in a Competence Based Curriculum: The Question of Quality Control of Education Standards," paper prepared for Conference on Quality Control in Higher Education, Antioch College, Columbia, Md., November 10-12, 1974.

10. Discussion group on PBTE and State Certification, August 13, 1975. The name of the professor has been deleted because he is not atypical and should not be singled out for his candor.

11. Pomeroy, Edward C., "What's Going on in Teacher Education--The View From Washington," speech presented to the Leadership Training Institute of the American Association of Colleges for Teacher Education, Annapolis, Md., August 14, 1975.

BIBLIOGRAPHY

Accreditation of Postsecondary Educational Institutions, 1974, Hearings before the Subcommittee on Education, U.S. Senate, 93rd Congress, Second Session, (Senate Committee on Labor and Public Welfare).

"AECT Guidelines for Advanced Programs in Educational Communications and Technology," Audiovisual Instruction, 19 (November 1974).

George Arnstein, "Accreditation, State Licensing and Approvals: Why the System Isn't Working," Phi Delta Kappan, 56 (February 1975).

_______________, "Bad Apples in Academe," American Education, 10 (August-September 1974).

_______________, "Ph.D., Anyone?" American Education, 10 (July 1974).

Frank G. Dickey and Jerry W. Miller, A Current Perspective on Accreditation, prepared by ERIC Clearinghouse on Higher Education, (Washington: American Association for Higher Education) 1972.

Federal Higher Education Programs--Institutional Eligibility, Part 1 Accreditation, Hearings before the Special Subcommittee on Education, U.S. House of Representatives, 93rd Congress, Second Session, 1974 (House Committee on Education and Labor).

"A Federal Strategy Report for Protection of the Consumer of Education," (Washington: Federal Interagency Committee on Education/Subcommittee on Consumer Protection: U.S. Office of Education) 1975.

Gatekeepers in Education: A Report on Institutional Licensing, (Washington: National Advisory Council on Education Professions Development) 1975.

Fred Harcleroad and Frank G. Dickey, Educational Auditing and Voluntary Institutional Accrediting, prepared by the ERIC Clearinghouse on Higher Education, (Washington: American Association for Higher Education) 1975.

An Illustrated Model for the Evaluation of Teacher Education Graduates, (Washington: American Association of Colleges for Teacher Education) 1970.

A Manual on Standards Affecting School Personnel in the United States, 1974, (Washington: National Education Association).

Donald J. McCarthy, et al., New Perspectives on Teacher Education, (San Francisco: Jossey-Bass) 1973.

NASDTEC Certification Reciprocity System 1973-74 List of Approved Programs, (Trenton: National Association of State Directors of Teacher Education and Certification) 1974.

NEA Handbook 1973-74, "Code of Ethics of the Education Profession," (Washington: National Education Association) 1974.

Harold Orlans, et al., Private Accreditation and Public Eligibility, (Lexington: Lexington Books) 1975.

Standards for the Accreditation of Teacher Education: The Accreditation of Basic and Advanced Preparation Programs for Professional School Personnel, (Washington: National Council for Accreditation of Teacher Education) 1972.

Standards for State Approval of Teacher Education, 1973, (Frankfort: National Association of State Directors of Teacher Education and Certification) 1975.

Taking Your Talents Across State Lines, "Interstate Agreement on Qualification of Educational Personnel" (Albany: Interstate Certification Project).

Twenty-First Annual List, National Council for Accreditation of Teacher Education, Washington, 1975.

CHAPTER 2

HISTORICAL BACKGROUND: STATE OF ILLINOIS PROCESSES AND STRUCTURE OF CERTIFICATION AND PROGRAM APPROVAL IN PROFESSIONAL EDUCATION

Susan K. Bentz

The Task Force members for Phase Two of the Project were representatives from various organized teaching groups, higher education, professional schools of education, state office personnel, and client and community groups. Realizing the diverse backgrounds of the participants this paper was commissioned in order to provide a common historical perspective of the program approval processes and certification in Illinois. From this comprehensive description of the current structure of certification and program approval the Task Force members had a base upon which to create and build their policy recommendations.

Illinois has a State Teacher Certification Board consisting of four college representatives, two public school administrators, six classroom teachers and one regional superintendent of schools. In the past this Board served as an advisor to the Superintendent of Public Instruction, With the creation of the new State Board of Education, the powers, responsibilities, and duties of the State Superintendent of Education and his staff, and the State Teacher Certification Board are now being reviewed and redefined. Traditionally, the State Teacher Certification Board determined certification criteria, suggested standards for teacher preparation training programs, and dealt with questions of suspension and revocation of certificates.

The Illinois Office of Education evaluates credentials for certification transmitted from regional superintendents. Candidates coming to Illinois may qualify for certification by holding a valid certificate from another state when meeting specific Illinois requirements or who have graduated from another state's NCATE approved college or university. A prospective teacher in Illinois is awarded a certificate by having completed a state approved teacher education program, the entitlement system of certification, or through transcript evaluation, a process whereby candidates submit evidence of having completed the number and type of courses prescribed by the state.

The state program approval policies require that an institution annually report on teacher education programs and the State Teacher Certification Board conduct visitations to institutions to examine and evaluate programs. The standards and criteria for institutional recognition, i.e., program approval, of teacher education programs are focused on institutional support, policies and procedures for admissions, advising and retention procedures, relationship to public school needs, program design and resources available for program operation.

The author concludes her paper with a section on governance issues. She points out that teacher organizations have been trying to gain control of certification and teacher education through an independent professional standards board or licensing commission. Such efforts, however, have not been successful although it is anticipated that future legislative proposals concerning an independent commission or Board will continue.

Historical Background:
State of Illinois Processes and Structure of Certification and Program Approval in Professional Education

Susan K. Bentz *

I. Structure and Governance of Certification in Illinois

The responsibility for the certification of educational personnel finds state responsibility evident as early as 1874, when upon the recommendation of local Boards of Examiners candidates were recommended to the Superintendent of Public Instruction as qualifying for statewide certification. Throughout the last part of the 19th century and until 1929, the primary authority for issuing teachers' certificates rested with each of the county superintendents of schools. Life certificates valid statewide, however, were issued by the Superintendent of Public Instruction. Between 1929 and 1932, all valid county certificates were exchanged for valid state certificates of equal rank.[1]

Historically, control of certification centered with the county superintendents of schools and only in 1929 became the responsibility of the Superintendent of Public Instruction. Earlier, in 1914, the Superintendent had assisting him a body known as the State Examining Board for Teachers. This Board was charged with the responsibility of setting examination criteria which was utilized by county superintendents. Effective in 1929, the State Examining Board for Teachers and the Superintendent of Public Instruction conducted examinations for certificates and additionally awarded certificates based upon college credits. The majority

---

* Assistant Superintendent, Department of Professional Relations and Services, Illinois Office of Education

of teachers and supervisors certificated qualified on the basis of two years of college credit. It was only in 1943 that state requirements for certification for a regular certificate required completion of a degree in a recognized college in Illinois and a specified distribution of credits established by the State Examining Board for Teachers. From 1943 until 1964, the majority of all teaching certificates issued were provisionals based on 60, and then later 90, semester hours of college credit and successful completion of an examination. It was first required in 1964 that no certificate be issued with less than a bachelor's degree, except for one very limited class of substitute certification.

During the first 30 years of operation of the Illinois State Examining Board for Teachers' certificates, the Board was a six-member body which in 1943 saw the addition of three college presidents. The name of the Board was changed in 1951 to the State Teacher Certification Board and composition of the Board was again changed in 1962 to include the representation of four college representatives, two public school administrators, three classroom teachers and two county superintendents. Legislation again changed the composition of the State Teacher Certification Board in 1973 to reflect its current membership which includes four college representatives, two public school administrators, six classroom teachers and one regional superintendent of schools. Throughout the history of the first examining board and then the State Teacher Certification Board, that body has served as an advisor to the Superintendent of Public Instruction. With the creation of the State Board of Education, that body has assumed the duties and responsibilities of the former Superintendent of Public Instruction including those affecting teacher certification and teacher education.

The State Board of Education is examining its role in the field of teacher certification at the present time as well as its other areas of responsibility and while retaining policy setting authority, will be considering methods of delegating responsibility for the operation of teacher certification and teacher education to the State Superintendent of Education and his staff, in consultation with the State Teacher Certification Board.

The State Teacher Certification Board and its predecessor have continuously advised the Superintendent and state department on teacher certification issues. A review of the minutes kept of the meetings since 1929 reveal continuously evolving concerns in the areas of: (1) certification criteria, whether by examination or by credentials; (2) continuing efforts to upgrade the quality of teacher preparation; and (3) vigorous efforts to deal with the suspension and revocation of certificates from some members of the profession. While an advisory body to the Superintendent and state department, the State Teacher Certification Board itself has exerted considerable influence in the establishment of well-codified rules and regulations which have withstood the test of time and various potential legal challenges. Since the time the state assumed primary responsibility for issuing certificates, there have been well over 60 separate and distinct types of certificates issued by the State of Illinois. The advice and counsel of the State Teacher Certification Board has been sought by the General Assembly as certificate improvements were legislatively considered. The Board historically sought to maintain a reasonable balance between meeting the needs of upgrading standards and emergency situations created by such intervening variables as World War II and the more recent severe shortage of teaching personnel during the 1960's. As colleges and universities increased training programs for teachers, the State Teacher Certification Board encouraged and achieved the reduction of emergency or provisional certification in an effort to both meet the supply needs for new teachers and upgrade the standards for entry into teaching.

The Superintendent and State Teacher Certification Board have historically been the recipients of numerous requests from professional organizations and interest groups to create specialized categories of certification. Increasing the requirements for physical education for all teaching certificates was evident in 1950 with the request from a physical education organization to improve the quality of preparation of physical education instructors and coaches.[2] The Illinois Education Association and the Illinois Federation of Teachers again in the 1950's vigorously encouraged the Examining Board to eliminate emergency certification. Efforts in 1953 saw the initial efforts of school social workers to obtain special certification. State music directors lobbied the State Teacher Certification Board in 1952 to eliminate music teachers from being required to complete student teaching.[4] Other groups, almost too numerous to mention, have requested certification throughout the Board's history, including the Illinois Principals' Association, school nurses, the Illinois Junior High School Association, the Illinois Reading Council and various groups of peripatologists, audiologists, school business officials and even school public relations officers.

The number of certificates currently issued by the State of Illinois totals 14. Of these, 12 are teaching types of certificates differentiated by grade level, specialty area, or validity in time; one category of certification exists for school service personnel, with endorsements for school social worker, guidance, school psychologist or school nurse; and, another category exists for administrators with four levels of endorsement--general supervisory, general administrative, superintendent, or school business official. It is this author's opinion that a variety of identifiable educational interest groups at an ever increasing number are seeking specialized certification as a form of state sanction for their positions in public schools. It is further assumed that these efforts have little to do with the need for a certificate as an attestation of acquired learning or achievement, but rather have more to do with the acquisition of the so-called traditional benefits of certificate holders; namely, salary schedule placement, retirement and tenure.

The State of Illinois, like many other states, has been experiencing efforts on the part of teachers' organizations to assume control of certification and teacher education through an independent professional standards board or licensing commission. Legislation introduced by the Illinois Education Association during the 1975 legislative session was not successful in creating such a separate commission independent of the State Board of Education.[5] It is anticipated that future legislative efforts to create an independent commission or board will continue.

II. The Certification Process

The certification process has changed very little over the years. Applicants, whether completing an examination or presenting credentials, have applied through a regional superintendent, who forwards those materials to the Illinois Office of Education for evaluation and issuance.

Certificates issued since 1953 must be registered annually with the Regional Superintendent of Schools in which region a certificated person works. Certificates issued prior to that date must only be registered while a person is actively engaged in teaching. Certificates are registered annually for a two dollar fee and will lapse only after a four-year period of non-registration. Such lapsed certificates may now be reinstated for a one-year period during which time an individual must earn 5 semester hours of credit, either in education or an area related to the teaching assignment, or present evidence of holding a valid certificate of some other type. Continuation of the ability to teach on a certificate is only governed by the required annual registration of the certificate.

Illinois has not entered into the Interstate Certification Compact nor does it maintain specific reciprocal certification agreements with any other state. Candidates coming to Illinois may qualify for certification by holding a valid regular certificate from another state and who meet the specific Illinois requirements, or who have graduated from another state's college or university with verification of having completed an NCATE (National Council for the Accreditation of Teacher Education) approved program at that institution. With slight variations all other states except Colorado, which requires NCATE program completion, operate the same procedure in certificating Illinois graduates.

From the time certificates were historically issued by the state, probably the most significant change occurred in 1961. It was in July 1961, that the Superintendent of Public Instruction in consultation with the State Teacher Certification Board implemented the system of awarding a certificate to an individual who had completed an approved teacher education program, a process also known as the entitlement system of certification. This change came about as a result of extensive work done by the State Teacher Certification Board during the 1950's. It was in 1955,[6] that the Superintendent of Public Instruction, upon the recommendation of the State Teacher Certification Board, adopted the significant policy change to permit teacher education institutions of the state to submit their respective teacher education programs to the Superintendent and the Board for approval which, once approved, would then entitle the institution to recommend its successful candidates for certificates without any further examination of credentials by state authorities. The Committee of the State Teacher Certification Board, in recommending this change to the approved program approach, was chaired by Dr. Robert B. Browne of the University of Illinois, who in his report to the Board stated that "this proposal was made in order to allow teacher education institutions more flexibility in setting up their teacher education programs....He stated that the institutions should be far ahead of the Board in knowing what direction we should move in the development of good teacher education programs....He further stated that the institution had a responsibility over and beyond the teaching of academic or professional subjects and it was the responsibility of the institution in screening students to see that they are good morally for the field they have chosen and also to determine their moral fitness for teaching."[7]

III. Teacher Education Program Approval

While the procedures have differed markedly, program approval policies adopted by the State Teacher Certification Board in 1955 are the identical policies that remain in effect today. One of the policy requirements was that institutions annually report on their teacher education programs and another required that the State Teacher Certification Board conduct visitations to institutions and examine and evaluate programs. The manner in which reporting of programs and visitations to institutions has occurred has varied considerably over the last 20 years. At the start of program reporting and institutional evaluating, the state required institutions to complete a several-page form upon which the institution entered statistical information and itemized the specific semester hours of coursework required. As the State Teacher Certification Board began a program of visitation in the 1960's, teams were sent of approximately five members to each institution. The team members, upon visiting with the institution, wrote a visitation report reflecting the team's perspective of the institution, organizational structure, administration, record keeping, curriculum for teacher education, faculty vita and a description of the facilities and instructional materials available. Information explaining the visitations were enumerated in the 1965 State Teacher Certification Board adopted "Guide for the Approval of Programs." Each Illinois institution preparing teachers was visited once under the 1965 guidelines. These visitations spanned 1965 to 1971.

At times, those visitation reports made suggestions to institutions designed to improve the teacher education programs. There was not, however, any state staff allocated to follow-up with those institutions to determine progress in complying with those recommendations. No institution was penalized or required to change any aspect of the teacher education programs. All institutions retained full approval.

As part of the national and state interest in reexamining teacher education and certification policies in the early 1970's, the state education department convened a special task force on the certification of educational personnel. The findings of the task force which reported to the Superintendent of Public Instruction in May 1972, focused on the need to improve the process of approving teacher education programs which since 1955 had been considered a state responsibility. As a result of the recommendations and concerns elicited from the task force, state department of education efforts focused on the creation of an approval system which set forth standards and criteria for institutions and programs as well as a procedure for institutional reporting and state evaluation. That system was approved by the Superintendent of Public Instruction in consultation with the State Teacher Certification Board in October 1973, and was field tested with Illinois institutions over the next year. As a result of the field testing, extensive modifications of the process were made and were formally approved by the State Superintendent of Education and the State Teacher Certification Board in March 1975.

The state department of education allocated staff beginning in 1972 to conduct the operation of teacher education program approval. That staff now numbers 7 professionals and two operations staff.

The standards and criteria for institutional recognition and program approval[9] developed throughout 1972 until final adoption in 1975 focus extensively on an institution's teacher education program in terms of its place within the institution, institutional support, policies and procedures; admission, advising and retention procedures; relationship to public school needs; and program design and resources. The Manual of

Procedures for Approving Illinois Teacher Education Institutions and Programs further requires institutional processes for due process to students[10] in teacher education programs and provides institutions with the levels of recognition and approval granted[11] and an institutional route of appeal.[12]

The state department of education encourages the approved program route to certification and believes that shifting from a course counting assessment to examining program components and the institution's compliance with standards and criteria insures a more significant evaluation process.

Completion of approved teacher education programs in 1955 was envisioned to be an increased degree of flexibility for institutions in conducting teacher education programs. It was anticipated at that time that increasingly more and more students preparing as teachers would complete approved programs. It has been only in the last three years that the number of candidates obtaining certification through the approved program, the entitlement route, has exceeded the number of individual applicants through transcript evaluation. Achieving the statutory change requiring completion of an approved program prior to certification has, with the exception of the Administrative Certificate, not been successful. Maintaining two systems of certification, evaluation and entitlement, have in essence permitted institutions to maintain two separate routes to certification for students.

IV. Certification System Issues - Chicago

While the preceding description of the certification system and the teacher education program approval system apply to downstate Illinois, those descriptions do not apply to the certification system for the City of Chicago. Municipalities with a population of over 500,000 are exempted from qualifying under the certification statutes applicable to downstate Illinois. The City of Chicago maintains the Chicago Board of Examiners which issues certificates to those teachers within the Chicago Board of Education school system. All teachers in the City of Chicago who attended an Illinois teacher education institution, of which there are currently 61, in most cases completed a program which qualified them for state certification.

NOTES

1. Counties over 500,000 population were excluded from this 1929-1932 certificate exchange period. In 1951 the statutes were amended to exclude only municipalities over 500,000 population. At this time all Cook County certificates excluding the City of Chicago, were exchanged for valid state certificates of equal rank.

2. Minutes of the State Teachers Examining Board, June 19, 1950, p. 1.

3. Minutes of the State Teachers Examining Board, December 27, 1951, p. 1.

4. Minutes of the State Teachers Examining Board, June 21, 1952, p. 5.

5. House Bill 2121 and Senate Bill 546 introduced to the 79th Illinois General Assembly.

6. Minutes of the State Teacher Certification Board, September 26, 1955, pp. 1-7.

7. Committee Report on Approving Teacher Education Programs to the State Teacher Certification Board, September 19, 1955, p. 1.

8. *Rules and Regulations to Govern the Certification of Teachers*, January 3, 1975, Article VIII, pp. 11-12.

9. *Manual of Procedures for Approving Illinois Teacher Education Institutions and Programs*, pp. 7-12.

10. *Ibid*., p. 8.

11. *Ibid*., pp. 2-4.

12. *Ibid*., pp. 5-6.

CHAPTER 3

ACCREDITATION AND CERTIFICATION POLICY ISSUES IN PROFESSIONAL EDUCATION

David H. Florio

A variety of factors have increased the interest in and need for the re-examination of voluntary accreditation, state mandated program approval, certification and continuing education. In this paper, the policy issues pertaining to these topics are examined from four perspectives: 1) voluntary accreditation of professional education, 2) interstate and intergovernmental relations regarding voluntary accreditation and state mandated program approval processes, 3) state mandated program approval processes in professional education, and 4) the relationship of professional licensing/certification to voluntary accreditation, state program approval, and continuing professional education. These areas were identified for purposes of classifying policy issues and clarifying the complex topic of program recognition for professional education preparation and continuing education. Often the policy issues overlap from one area to another, therefore the topic delineations are merely aids for analyzing the issues which are multifaceted.

Voluntary accreditation of professional education (regional and national) centers on the voluntary self-appraisal and external program review of professional education programs in institutions of higher education. Major issues include: 1) What is the purpose of voluntary accreditation in teacher education? 2) Who should control procedures for institutional voluntary accreditation? 3) What are the problems associated with current voluntary accreditation governance, criteria, standards, and evaluation techniques?

Interstate and intergovernmental relations regarding voluntary accreditation and stated mandated program approval processes deals with the issues surrounding the interrelationships between governmental bodies and between states concerning program approvals, individual professional certification, and recognition of accrediting/program approval bodies. Questions in this area center on what roles and responsibilities should the state, regional and national bodies have in determining institutional eligibility for receipt of governmental funds, provide for consumer protection, establish rules for certification reciprocity, and monitor information gathering processes.

State legislative mandated program approval processes in professional education involves issues which include the governance structure, criteria, and procedures for determining program approval within states.

The relationship of professional licensing/certification and program approval to voluntary accreditation and continuing professional education deals with the issues involving continuing education and the use of professional organizations as quasi-governmental bodies. The author concludes his paper with a summary of major problems which include: 1) should we continue to license teachers, 2) what does the license certify, 3) who has the responsibility for quality control in teacher certification, 4) should certification at the entry level be sufficient for a professional life, 5) should graduation from a nationally accredited institution be sufficient evidence for gaining a certificate in a number of states, and 6) should continued certification be tied to continued development and/or formal education.

Accreditation and Certification Policy Issues in Professional Education

David H. Florio *

Introduction

Voluntary accreditation, state mandated program approval, and professional certification policy issues in professional education are among the most salient topics for discussion both within the professional education circles and among various publics served by educators. These policy issues can be viewed from four interdependent viewpoints. The following topics are appropriate for classifying various issues; however, as is noted below, the issues do not necessarily fit cleanly into any single area. Several policy issues are appropriate for consideration within more than one area as well. This report provides a brief description of each area and a tentative classification of policy issues under each area.

A. Voluntary accreditation of professional education (Regional and National)

This area deals with the voluntary self appraisal and external program review of professional education programs in institutions of higher education. The self regulation of professional regulation in continuing education programs is a major thematic area for discussion of policy issues in professional education.

B. Interstate and intergovernmental relations regarding voluntary accreditation and state mandated program approval processes.

This area deals with the issues surrounding the interrelationships

---

* Project Consultant, Illinois Policy Conference, School of Education, Northwestern University

between governmental bodies and between states concerning program approvals, individual professional certification, and the recognition of accrediting/program approval bodies.

C. Instate mandated program approval processes in professional education

This area deals with the state mandated (legislative) program approval issues. Issues in this area deal with the governance, criteria, and processes of program approval within states.

D. Relationship of professional licensing/certification to voluntary accreditation, state program approval, and continuing professional education.

This area deals with the issues that surround the relationships between individual certification/continuing education and the institutional recognition either through voluntary accreditation or state program approvals.

These four thematic areas have been identified for the purposes of classifying policy issues and clarifying the complex topic of program recognition for professional education preparation and continuing education. There are no clean breaks for the areas described above and the following policy issues often overlap more than one thematic area.

Issues

A. Voluntary accreditation of professional education

1. What is the purpose of voluntary accreditation in teacher education?

   a. The maintenance of minimal standards?

   b. The assessment of an institution's ability to meet its own goals?

   c. A process to be used to promote and stimulate institutional renewal and improvement?

d. A screening device for eligibility for governmental funding on a state and/or national level?

e. A means to protect and serve the public interest against incompetence?

Note: These reasons and others have been used to justify and describe the purposes of accreditation; they represent the disparity of perspectives that need to be examined and dealt with.

2. Who should decide what criteria, standards, and procedures for institutional voluntary accreditation?

a. There is a growing demand for "professional control of entry into and monitoring of the education professions, but there is little agreement as to who constitutes the group called professionals--for example, college faculty, practicing teachers, leaders of organized professional groups, school administrators, school officials, etc.

b. There is also a significant concern of the role that parents and other lay member/interest groups might play in (1) determining standards and (2) the process of review, e.g. serving on policy and review boards.

3. What are the normative/reference group issues that should be taken into consideration when comparing or evaluating professional preparation programs within and between institutions of higher education?

a. Is there a need for pluralism or diversity of institutional types in professional preparation and continuing education programs?

b. Should comparisons be made and, if they are made, should they be within state on a national and/or regional basis?

4. Should there be more cooperation between state program approval/ agencies (mandatory review) and voluntary accreditation organizations (NCATE)?

5. Should the costs for institutional review be shared between the institutions and its publics or should they be a primary burden of the institution being reviewed?

6. Should new programs and innovative institutions be "frozen out" of the accreditation process because they cannot afford the high cost of multiple reviews and self studies? (e.g. state program approval, voluntary accreditation for teacher education, regional higher education accreditation)

7. Are there more cost effective procedures for accreditation (monitoring and review functions) that would provide equal or better benefits to both the institution and the public than those now being used?

8. Are current NCATE activities moving professional education forward or are they stagnating the profession by approving programs at the lowest common denominator?

   a. What does an institution have to lose if it loses its NCATE approval?

   b. What does the public have to lose if current NCATE activities were discontinued?

9. What are the problems associated with outcome evaluation and assessment as opposed to process evaluation currently dominating the accreditation process?

   a. What kinds of outcomes should accreditation reviews consider, e.g. student achievement, success on the job, student perception of program value, etc.?

   b. What is the current "capacity" for measuring these outcomes?

10. How is the balance to be achieved for continuous development and innovation in professional education and the need to maintain minimal standards for our professional preparation.

11. What are the training needs of the individuals (gatekeepers) charged with the monitoring and review of professional education programs?

12. What procedures can be used to ensure that the most qualified

individuals participate in institutional review/quality control?

13. What should be the cooperative/collaborative structure in teacher education/accreditation and teacher certification?

- a. What is the nature of the relationship that ought to be developed and reinforced among institutions of higher education, state agencies, local school districts, and the organized teaching profession?
- b. What are the roles of these organizations?
- c. What is the role of professional education associations/organizations in the accreditation/certification process? (AACTE, AASA, etc.)

14. What are the criteria, standards, and techniques most appropriate for determining professional education programs/individual quality?

- a. What are the outcomes desired?
- b. At what level of performance should individuals be deemed "competent"?
- c. What measures will be used to determine whether outcomes have been attained at a defined or acceptable standard? (How reliable and valid are these measures?)

15. What are the enforcement procedures, grievance procedures, and penalties (for both clients and institutions) that should operate as a result of the accreditation processes?

B. Interstate and intergovernmental relations regarding voluntary accreditation and state mandated program approval processes.

1. What is the appropriate screening device for determining institutional eligibility for receipt of government funds on a state/national level?

- a. Should it be regional higher education accreditation?
- b. Should it be voluntary professional education accreditation? (NCATE)
- c. Should it be some combination of regional and professional accreditation?

d. Should it be direct governmental review?

2. What means can be used to protect the public interest against incompetence and fraud in postsecondary professional education programs?

3. If comparisons are made among institutions of higher education involved in teacher and other education professional preparation, what should be the reference group?

a. Instate?

b. Regional?

c. National?

4. Should national accreditation recognition be mandatory for institutions of higher education desiring either federal or state funds?

5. Is national accreditation recognition adequate for certification reciprocity among different states?

6. Should national accreditation recognition be a preliminary requirement for instate mandatory program approval?

7. What information should be shared concerning the criteria, standards, and procedures, etc. in the monitoring and review processes within the state, interstate, intergovernmental, etc.? How should such information be disseminated?

a. Should national voluntary accreditation review reports be in the public domain?

b. Should mandatory state program approval reports be in the public domain?

c. If either of these reports is made public, what processes should be available for institutional response, clarification, correction, and challenge?

8. What kinds of support and/or assistance can state program approval agencies expect or should request from the federal government, e.g.,

technical assistance, data banks and a clearing house, staff development and training, conferences, etc.?

9. Should state agencies delegate their program approval authority to voluntary accrediting agencies?

10. Should state agencies delegate their teacher certification authority to teacher preparation institutions?

   a. Is there a conflict of interest if such delegation is made?

   b. Are professional preparation institutions capable of adequate individual evaluation?

   c. What is the role of the organized teaching profession in the certification process?

11. What is the research and development function to be performed--by whom?

C. Instate mandated program approval processes in professional education

1. Who should decide what criteria, standards, and procedures should be used for mandated state program approval in professional education?

   a. Lay boards of education (LEA/SEA)?

   b. Teachers/Teacher organizations?

   c. Higher education faculty/administration?

   d. Parents and other community organizations?

2. In order for state monitoring and review functions to be effectively discharged, what processes should be used?

3. What is the role of the chief state school officer and his/her staff in the program approval process?

   a. Advisory to the state certification board?

   b. Recipient of advice from certification/standards boards?

   c. Development, maintenance, review, etc. of the program approval processes?

4. What means can be used to ensure that the most qualified individuals participate in the institution program review/quality control?

5. What are the normative/reference groups to be used in comparing institutions within the state?

   a. How do you maintain a balance of innovation and experimentation in program and a need for minimal standards in professional preparation/continuing education?

   b. Should there be pluralism or diversity in program types or a common procedure for professional preparation and continuing education?

6. What should be the cooperative structure between state program approval and national/regional voluntary accreditation?

7. Should the costs for institutional review be shared between the institution and the state agency or should they be the primary burden of the institution being reviewed?

8. Should new programs and innovative institutions be left out of the program approval process because they cannot afford the high costs of multiple reviews and self studies? e,g. state, regional, national program review and accreditation?

9. Are there more cost effective procedures for program monitoring and review within states that would provide equal or better benefits for both the institution and the public than those now being used?

10. Should program approval concentrate on outcome evaluation as opposed to process evaluation dominating the program review procedures?

   a. What kinds of outcomes should be measured, e.g. student achievement, success on the job, student perceptions of program value, etc.?

   b. What is the current capacity for measuring these outcomes?

11. How does the state facilitate and/or stimulate reform and change without opening the doors to diploma mills, short cut degree programs, fraudulent practices and courses with fancy names but little substance?

12. What are the training needs for the gatekeepers, individuals charged with the responsibility of monitoring and review of programs in professional education?

a. Who should perform the training activities?

b. Who should pay for the training activities?

c. What procedures can be used to ensure that the most qualified individuals participate in institution review/quality control?

13. What should be the cooperative structure in state program approval among institutions of higher education, state agencies, local school districts, and the organized teaching profession?

14. What criteria, standards, and techniques should be employed in determining professional education program quality?

a. What outcomes are desired?

b. At what level of performance should individuals be deemed competent?

c. What measures will be used to determine whether outcomes have attained at a defined or acceptable standard? (How reliable and valid are these measures?)

15. What are the enforcement procedures, grievance procedures and penalties that should operate as a result of the program approval process?

a. For clients (students)?

b. For institutions?

c. For the public?

D. Relationship of professional licensing/certification to voluntary accreditation, state program approval, and continuing professional education.

1. Should we continue to credential (license) teachers?

    a. If yes, why?

    b. If no, what will be lost by abolishing the credentialing system?

    c. What are the advantages/disadvantages to teachers, to the profession, to the public?

2. Is the current process of teacher certification adequate to guarantee a minimum level of quality for all teachers certified?

    a. If not, what is needed to improve the system?

    b. Who should decide?

        i. The teachers and/or teacher organizations?
        ii. Faculty and administration in higher education programs of professional preparation and continuing education?
        iii. State offices of education personnel?
        iv. Local and/or state boards of education?
        v. A review/policy body representative of the above groups?

3. In evaluating individuals for certification, what kinds of outcomes should be assessed?

    a. What are the criteria?

    b. What are the standards (levels of performance within criteria)?

    c. What are the measures used to determine whether outcomes have been attained at a defined acceptable standard?

4. Who should be responsible for enforcing these criteria and standards?

    a. What are the grievance procedures for individuals denied certification?

    b. What are the penalties for failure to meet minimal criteria? (Failure to obtain certification, probationary status, etc.)

5. What is the role of the state teacher certification/standards board?

   a. Advisory to the chief state school officer?

   b. Final authority for certification? (Accepting the advice of the chief state school officer?)

6. How are parents and other interested publics to be involved in the certification process? Should they be?

7. What are the training needs of individuals charged with assessing individuals for certification?

   a. Who should do this training?

   b. Who should pay for the training?

8. Where does the responsibility for quality control in teacher certification reside?

   a. If teachers desire more control over entry and appraisal of their peers, should they take an active role in the screening and review of their colleagues?

   b. Will they?

9. What should be the cooperative relationship between the state certification process and the program recognition process?

   a. Between certification and state program approval?

   b. Between certification and national voluntary accreditation?

10. Should the state delegate its certification authority to:

    a. The professional teacher organizations?

    b. Institutions of higher education?

    c. A certification/standards board representative of teachers, faculty from institutions of higher education, university administrators, school board members, parents, etc.?

11. Currently the delegation has been to institutions of higher education. Does this present a conflict of interest?

   a. Making those with the responsibility for nurturing students their judges for certification.

   b. With institutions interested in retaining student population and responsible for screening people out of their programs.

12. Is there a body of knowledge which every teacher should master in order to be certified?

   a. Who defines and validates this body of knowledge?

   b. How do we deal with the divergent lists of competencies provided under competency based teacher education programs?

   c. Who is to perform the research and development roles with regard to these questions?

13. How do we encourage valuable resource people to participate in learning programs for students while at the same time retain a certification process designed to screen out individuals lacking certain degrees and/or credits?

14. Should states with large urban populations retain separate certifying procedures for the urban areas and the remainder of the state?

   a. What is the purpose of this dual certification system?

   b. What are the consequences of unifying the certification system?

15. Should there be some sort of national system for teacher certification?

   a. Who should perform the function of certifying teachers on a national basis?

    i. Professional associations?
    ii. Federal government?
    iii. Interstate organizations?

16. Should the state mandate certification for teachers practicing in non-public schools?

17. Should certification at an entry level be sufficient for a professional life?

  a. If not, what means of serial or recurrent certification should be employed?

  b. Who should determine what continuing education activities are sufficient for certification renewal?

  c. At what intervals should certification be reviewed?

It is clear that the current state of the art in professional preparation and continuing education is nebulous at best. The questions in the above issues clearly point to the ambiguities and knowledge gaps currently existing in regard to teaching and learning in our society. Due to this condition, professional education has had to resort to proxy measures and assessment for determining the quality of teachers. An assumption is seemingly made that a student completing a program approved by the state and/or nation accrediting body is prepared to take on the role of teacher or another education profession. In recent years, various publics and members of the profession have challenged this assumption.

Asking the question, "What is a good teacher?" may be inappropriate. Given the diversity of students and teachers, the more appropriate question should be, "What is this teacher good for?" If students learn in differing manners and teachers teach in differing ways, the challenge is not to prepare in a standard way but rather to match the learner with the most appropriate teaching. Therefore, recognition of programs for teacher preparation and continuing education must address the need for diversity while retaining a level of quality in all programs.

The issues presented above are not necessarily complete, well defined, or given in any priority order. It is the challenge of this conference to identify the most important issues and define them in ways that will both increase their level of clarity and point the way for further inquiry.

CHAPTER 4

INSTITUTIONAL ACCREDITATION AND TEACHER CERTIFICATION: SOME NOTES ON THE STATE OF THE LAW

William R. Hazard

The influence of the courts on educational policy-making is of major significance. This paper was commissioned to examine "the state of the law" concerning voluntary accreditation of postsecondary educational institutions and state certification. Issues and policy implications from legislation, administrative agency rules and regulations, and case-law regarding accreditation and certification are analyzed.

It is the author's conclusion that the federal role in accreditation activities is enlarging. The author observes that with little modification in existing law, the Federal government could take over the major accreditation decision-making authority. Through the Commissioner's existing authority under legislative power to grant institutions eligibility to receive government contracts and grants, the Federal government can regulate, through "recognition," regional and national accrediting agencies, state education agency approvals, and individual institutions. The traditional restraints limiting federal involvement in accreditation are threatened by alleged shortcomings in private accrediting agencies' capacity for quality control. The broad re-examination of the accreditation process, its aims strengths, and weaknesses reflect widespread concern over quality control issues.

State authority to credential school personnel and approve preparation programs, coupled with its federally maintained role in postsecondary education accreditation, raises the potential for serious conflict with voluntary and federal recognition efforts. There seems to be no legal barrier to increased state control of the preparation and credentialling of school personnel; unresolved national debate is now under way concerning the proper state role for federal funding eligibility.

Moving from a long tradition of legal restraint in the internal affairs of voluntary private accreditation associations, both state and federal courts are closer to direct and pervasive intervention in the accreditation process. Recent cases--including Parsons College v. North Central Association and Marjorie Webster Jr. College, Inc. v. Middle States Association--clearly indicate that the courts are prepared to apply anti-trust legislation and constitutional restrictions to the judgments and decisions of voluntary accreditation agencies. The traditional view that the associations' procedures were non-governmental, hence not subject to constitutional restraints, is outworn. Further, the application of Title VII of the 1964 Civil Rights Act, as exemplified in Griggs v. Duke Power Company and subsequent cases, clearly indicates that credentialling requirements and job qualifications in schools must be job related. In conclusion, the author discusses the connection between preparation programs, job requirements, and credentialing recognition that must be established as a prerequisite to reform in the certification of education personnel.

Institutional Accreditation and Teacher Certification: Some Notes on the State of the Law

William R. Hazard *

The "state of the law" concerning voluntary accreditation of colleges, universities and other post-secondary educational institutions and the state certification of teachers has become the object of increased interest as producers and consumers of education examine more closely the goals, processes, outcomes, and investments in the schooling enterprise. The national concern for improved common schooling necessarily reaches up the educational hierarchy to involve teacher preparation and the structural intricacies of state control over entry into teaching, the voluntary national and regional accrediting associations, and the role of the federal government in the institutional accreditation process. Conceptually, it may be useful to consider the institutional accreditation machinery and processes (at the several levels - state, regional, and national) as input data and the state teacher certification (or licensing, if you prefer) mechanisms as output data in examining the impact of federal and state legislation, administrative agency rules and regulations, and pertinent case law on the ultimate goal of providing high quality professional staff for common schools. Conceptualized in this way, the examination of the law concerning these two processes - accreditation and certification - can be confined to manageable parameters and focused on twinkling - if not fixed - stars.

This paper seeks to articulate and analyze the issues and raise policy implications from legislation, administrative agency rules and regulations, and case-law concerning accreditation and teacher certification.

---

* Professor of Education, Northwestern University; attorney at law

The principal focus of state legislation and administrative consequences is on Illinois with due regard paid to federal legislation and case law, as relevant. The law and the issues in federal recognition, voluntary institutional accreditation, state recognition authority, and teacher certification will be discussed in order, selected case law will be examined, and summary conclusions and directions will be drawn to serve as policy guides. For this examination, Selden's definition of accreditation[1] is adopted:

> "A process whereby an organization or an agency recognizes a college or university or a program of study, as having met certain predetermined qualification standards."

"State recognition" is defined as the process by which the chief state school officer's statutory authority over standards for schools, school districts, and other educational institutions is exercised (Ill.Rev.Stat., Chapter 122, sec. 2-3.25).[2] The accreditation and recognition processes - though different in many ways - share concern for qualitative standards related to institutional outcomes and warrant similar examination approaches.

Federal role in accreditation

The federal government has never assumed a major role in the accreditation of educational institutions. Its restraint, according to Kaplan and Hunter,[3] stems from a long tradition of state and local control of education and the realization that greater activity in the area would have serious educational and political implications. The absence of direct delegation of educational authority to the federal government in the U.S. Constitution and the reservation of such authority to the states by the 10th amendment places governing authority over education in the states. Through a wide variety of fiscal support mechanisms, however, the federal government is able to exert considerable influence on the structure and operation of schools at all levels. Recent judicial history clearly reflects the federal government's concern for and control of a broad spectrum of student-school relationships including personal rights of students under the 1st, 4th, 5th, and 14th amendments. Statutes providing for the distribution of funds to educational institutions give the Commissioner two kinds of accrediting authority. First, the official recognition authority vested in the Commissioner to "publish a list ... of the accrediting agencies and associations which he determines to be reliable authorities as to the quality of training offered by educational institutions or programs, either in a geographical area or in a specialized field." (20 U.S.C. 1141 (a)). Since qualification for federal funding depends, in part, upon the accredited status of the institution and that status derives from a private accrediting agency, the Commissioner's influence on both the institution and the accrediting agency is substantial. Likewise, the authority in the Commissioner to withhold approval of accrediting agencies and associations is a heavy weight over both the accrediting agency and its client institutions. The second kind of authority vested in the Commissioner is operative when an applicant for federal aid is unaccredited but there is a recognized agency in the field. In these circumstances, if the Commissioner determines that there is "satisfactory assurance" that a school will meet the agency's accreditation standards "within a reasonable time",[4] the institution is deemed accredited for federal grants under the applicable statute.[5] The effect of this authority is to bestow accreditation upon unaccredited institutions. Further, if there is no recognized accrediting agency in the field, the Commissioner may set his own standards.[6] Although the federal-aid statutes clearly place the primary accreditation responsibilities on the private accreditation agencies and associations, the congressional acceptance of an accrediting responsibility (through authority vested in the U.S. Commissioner of Education) suggests that federal involvement could expand. Recent developments in federal regulation of accrediting agencies and proposed revisions of federal rules for institutional eligibility (for federal grants) have aroused grave concern among education organizations.[7] Although the federal bureaucrats argue that their increased interest in accreditation matters and institutional quality criteria stem from a profound concern for consumer protection in higher education, some observers fear a federal take-over of the broad accreditation roles now claimed by private accrediting associations. Recent federal legislation, proposed, floated, and subsequently recalled (by H.E.W. Secretary Mathews at the insistence of some education associations) for public hearings would, *inter alia*, (a) give the federal government access to financial, attendance, admission, and other records it needs to audit any funds received from federally-aided students or to determine the institution's compliance with program guidelines, (b) allow the Office of Education to recognize state agencies to determine the eligibility of all vocational schools, whether public, non-public, profit, or non-profit, (c) expand the powers and role of the National Advisory Committee on Accreditiation and Institutional Eligibility to include its authority to determine eligibility of institutions that do not fit under any established accrediting group or state agency, and (d) require as a condition of eligibility, institutional compliance with OE regulations on student records, public disclosure of statistics on performance of the institution and its graduates, and standards of ethics for advertising and enrolling students. (See Appendix A for excerpts from the proposed eligibility legislation.) It seems clear that the federal role in accreditation, relatively benign until recently, could expand with substantial consequences to the accrediting agencies, the institutions, and the accrediting process itself.

Under regulations approved by the H.E.W. Secretary on August 16, 1974, (effective August 20, 1974), procedures for the Commissioner's recognition of national accrediting bodies and state agencies were implemented. Under prior congressional authority,[8] the regulations implement the federal authority to "accredit the accrediting agencies" and to condition institutional eligibility for federal aid programs on their accreditation by private agencies and associations. The regulatory language[9] reads:

> "Accreditation of institutions or programs of institutions by agencies or associations nationally recognized by the U.S. Commissioner of Education is a prerequisite to the eligibility for Federal financial assistance of institutions and of the students attending such institutions under a wide variety of federally supported programs. The recognition of such agencies is reflected in lists published by the Commissioner in the Federal Register. Inclusion on such list is dependent upon the Commissioner's finding that any such recognized agency or association is reliable authority as to the quality of training offered. The Commissioner's recognition is granted and the agency or association is included on the list only when it meets the criteria established by the Commissioner...."

National recognition of an accrediting agency or association depends on its ability to meet the Commissioner's criteria[10] on, (a) functional aspects (scope of operations, organization, procedures), (b) responsibility (serves a clearly identified need, responsive to the public interest, assures due process in its accrediting procedures, demonstrated ability to foster ethical practices in member institutions, evaluates its educational standards, secures solid data base for qualitative judgments about institutions, encourages experimental programs, holds institutions to its standards fairly applied, reevlautes at reasonable intervals, and requires truth in accreditation advertising), and (c) reliability (acceptance of its procedures by informed constituents, regular review of standards, at least two years' experience as an accrediting agency or association, and a policy making body reflective of the community of interests served) and (d) autonomy (guards the integrity of its judgments, and operates to prevent conflict of interest in its judgments and decisions).

Further regulations "authorize the Commissioner to publish a list of State agencies which... he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective states." Procedures for initial recognition and reevaluation and criteria for recognition are set out in detail.[12] The criteria for state agency recognition are roughly parallel to those for national accrediting agencies. Part 149 entitled "Commissioner's Recognition Procedures for National Accrediting Bodies and State Agencies" are set out in Appendix B.

The Commissioner's list, as published in the Federal Register on January 16, 1969, included the six regional accrediting bodies (Middle States, New England Association, North Central Association, Northwest Association, Southern Association, and the Western Association), thirty specialized accrediting bodies (including, *inter alia*, NCATE), and the New York Board of Regents. (See Appendix C for 1969 and 1975 lists.)

It seems evident that ample precedent and congressional support exists for limited federal activity in institutional and program accreditation. The recent interest aroused over possible extension and elaboration of federal activities in accreditation may indicate the state of political art in accreditation but gives no clear signal either as to bureaucratic intent or consequences for existing national or state accrediting bodies. The federal role can fit easily into the federal-aid statute framework. As Kaplan and Hunter noted:

> "Purse-strings control is the most likely method by which the federal government could influence education and private accrediting bodies in particular. Since the regional and national associations are interstate in nature, the interstate commerce clause is another possible source of power. But it is not likely that accreditation is itself commerce, and the effect upon commerce is difficult to ascertain."

The application of antitrust laws and the questions of whether education (and accreditation) falls within the meaning of "trade" or "commerce" as used in the Sherman Act was examined in a suit by Marjorie Webster Junior College against the Middle States Association (case discussed below, pp.82-84).

Whether the federal authority over accreditation stems from fiscal control or some constitutional mandate is not relevant; the significant inquiry ought to be directed at the educational and political consequences. Chief Justice John Marshall of the Supreme Court noted that "... the power to tax involves the power to destroy... ."[13] Without intending violence to his meaning, we might observe that the federal power to "recognize" or accredit likewise involves the power to destroy. The traditional autonomy of private accrediting agencies and associations seems to offer little protection against increased federal involvement in the process. The importance of autonomous accrediting agencies can hardly be overstated. As Professor Chafee notes, in a "classic" piece on associations[14]:

> "The value of autonomy is a final reason which may incline the courts to leave associations alone... Like individuals, they will usually do most for the community if they are free to determine their own lives for the present and the future. A due regard for the corresponding interests of others is desirable, but must be somewhat enforced by public opinion."

The extension of federal involvement in accreditation through administrative rules and regulations could pose a more serious threat and exert more pervasive influence on the accreditation process than a dozen court decisions.

One alternative to a federal take-over of the accrediting process may be the National Commission on Accrediting, created in 1950 to "...alleviate the chaos and confusion which then pervaded the accrediting field."[15] Created to "accredit" accrediting agencies, the National Commission had a constituent membership of seven national organizations[16] and served approximately 1300 member colleges and universities whose dues financed its operation. It accredited the six regional accrediting associations and approximately thirty national professional accrediting agencies. The Commission's primary objective was to assure some degree of uniformity and interrelation between the regional and professional accrediting associations and to avoid unnecessary overlap and duplication of effort by the institutions and the agencies. The delicate balance between unity and autonomy among the several accrediting agencies has been struck, more or less successfully, by the National Commission's restraint and respect for institutional variations in operational procedures while holding their broad policies to the Commission's standards. On January 1, 1975, the National Commission on Accreditation and the Federation of Regional Accrediting Commissions of Higher Education merged into the Council on Postsecondary Accreditation (COPA). It seems evident that the current and proposed "recognition" activities by the U.S. Commissioner of Education could challenge the functional need and the future viability of COPA and the regional and professional accrediting associations.

State role in accreditation for teacher education

Although the State of Illinois does not formally "accredit" institutions or programs of teacher education, the indirect and informal consequences of its teacher certification machinery amounts to an accreditation process. Beyond the state agency's authority to determine the "quality of public postsecondary vocational education" delegated by the U.S. Commissioner of Education,[17] the State of Illinois has statutory[18] and administrative[19] control over the credentialling of teachers and the institutional programs of preparation. Under the "approved program" concept, the State Board of Education, through the State Teacher Certification Board,[20] reviews institutional programs of teacher preparation and makes judgments about the quality of education in general and of the teacher education programs in particular in the applicant public and non-public institutions in the state.[21] Satisfactory review by the State results in "approval" of the institutions programs, and graduates therefrom are credentialled by the State by institutional recommendation.

Although this process clearly is not the same as regional or national accreditation, the potential for indirect, the particularized and detailed, examination of the full sweep of institutional "quality indicators" is there. There seems to be little evidence that regional or national accreditation is any more productive of quality teacher education than is possible through some state-mandated and state-monitored procedures. Obviously, the problem of quality control and uniform standards likely would not be addressed by state-level accreditation and broad variations in program elements, evaluation, and operations likely would follow. These problems however, are not solved under the current regional and national accreditation schemes.

The concerns and disenchantments growing out of current accreditation procedures (e.g., overlapping, duplicatory processes, expensive and occasionally pointless data mandates, and alleged irrelevance of accreditation criteria) prompt serious reexamination of the accreditation process. From the consumer's viewpoint, accreditation should not only classify institutions on some meaningful quality indicators,but should somehow improve the quality of education in the participant institutions. To the extent that state intervention in colleges and universities promotes educational improvement and provides informed judgments of instititional quality, whether by "recognition" or "accreditation" processes, the state machinery stands as an available option to regional, professional, or federal accreditation. One need not challenge the conclusions of the "Orlans Report"[22] or quarrel with its underlying assumptions to consider state accreditation as one alternative (among many) to regional, professional, or federal accreditation, *as now functioning*. The states have the constitutional and statutory authority to regulate educational institutions operating within their borders; whether such regulatory authority should extend to *de facto* or *de jure* accreditation poses no particular legal problem, but may raise other political and educational issues. To dismiss out of hand the option of a substantial state role in accreditation, in my mind, begs the question of how best to develop effective and efficient education at all levels.

State regulation of teacher certification in Illinois

Except for the Chicago School District (which has independent teacher-credentialling authority[23]), the credentialling of all teachers and administrators in Illinois public schools is regulated by state statute[24] and administrative rules promulgated by the State Board of Education.[25] The professional credentials are issued by the State Teacher Certification, are valid for a fixed length of time,[26] and renewable upon the presentation of specified evidence of professional development.[27] Certificates are registered and renewed by proper and timely application by the holder of the county superintendent (Superintendent of the Educational Service Region) having jurisdiction over the employing school district.[28] The statute[29] vests in the State Superintendent, in consultation with the State Teacher Certification Board, authority to "recognize" schools, colleges, universities, junior colleges, and special or technical schools as teacher training institutions. Application for such recognition is made by the institution to the State Superintendent who, in consultation with the State Certification Board, sets criteria, conducts official inspections, and grants "recognition" to those meeting the required standards. The State Superintendent, in consultation with the State Certification Board "... shall have the power to define a major or minor when used as a basis for recognition and certification purposes."[30]

Suspension and revocation of certificates are provided for by statute. The county superintendent and the State Superintendent share authority to suspend certificates for cause for a period not to exceed one calendar year. Revocation is possible by the State Superintendent after the teacher has an opportunity for a hearing before the State Teacher Certification Board.[31] Provisions of the Administrative Review Act[32] apply to and govern all proceedings instituted for judicial review of final administrative decisions of the Sate Superintendent, the State Teacher Certification Board, and the county superintendent of schools under the teacher certification article (Art.21, Chapter 122, I.R.S.).[33]

Subject to the constitutional protections extending to applicants, the State has near plenary authority over the requirements for teaching and administrative certificates. This authority, derived from the State Constitution,[34] is exercised by the General Assembly through its enactment of the statutes and by its vesting the State Board of Education with a variety of powers (in addition, of course, to those granted by the Constitutional Mandate to the State Board[35]), including the licensing of teachers. Administrative regulations detailing the standards governing the preparation of professional personnel for Illinois schools as prescribed in Circular Series A, No. 160, 1974, are set out in Appendix D.

In summary, the state, through statutory and administrative means, regulates the credentialling of certificated school personnel. The mechanisms, procedures, and structures for teacher credentialling are subject to state regulation and vary widely among the states. The regulation of teacher education programs and institutions is achieved through "recognition" procedures vested by the State in the State Board of Education, the State Superintendent of Education and the State Teacher Certification Board. Any institution, public or non-public, nonprofit or proprietary, which wishes recognition by the State of Illinois as a teacher training institution, must apply to and be approved by the State Superintendent pursuant to standards determined by the State Superintendent.

State recognition carries the potential for duplicating the fundamental purpose of regional and professional accreditation. From the institution's standpoint, the state recognition requirements, in many areas, duplicate, overlap, and repeat the requirements imposed by other accrediting bodies.

State recognition is nonvoluntary in nature. Those schools, colleges, and universities who wish to be recognized teacher training institutions must request the application of the recognition process. In a real sense, compliance with the recognition standards and requirements is simply the price of "doing business" in the State of Illinois. The nonvoluntary nature of state and federal regulation is contrasted with the popular notion that regional and national profession accreditation is voluntary in nature and hence manifests a higher level of autonomy. Such comparisons slightly warp the truth. To the extent that non-accredited status is a burden to the institution, there is substantial pressure to gain and retain "accredited" status. The consequences of being denied the status or losing it reach to student recruitment, placement, credentialling, and other fiscally-related institutional concerns. In my judgment, both state recognition and private accreditation are nonvoluntary decisions by the applicant/member institutions and whatever comparisons or debate about the several accreditation options must proceed along other, more significant, lines.

Selected court decisions

We come now to an examination of some selected decisions from state and federal courts. As noted above, institutions of higher education generally eschew political and governmental interference[36] and argue that institutional autonomy and voluntary cooperation is the best road to quality education and general good health of the academic community. Until recently the courts have generally followed a course of noninterference in the internal matters of accrediting associations. As Kaplan and Hunter noted, "Because they are private and voluntary, because they usually operate in areas of little concern to the public, and because they are designed to thrive on autonomy, associations have generally been free from Court supervision."[37] The reasons for judicial noninterference usually include: (a) as to nonmembers (and applicants for accreditation), denial of membership confers no legal right or standing inasmuch as he has no right to participate in the organizational decision, and (b) the member, upon entering the association, typically contracts to play by the association's rules and, unless the organization acts contrary to its own rules in removing or disciplining the member, the courts have been reluctant to intervene. Changing conditions in consumer interests in higher education, a heightened sense of public accountability, and more severe institutional consequences from the denial or removal of "accredited status", coupled with an increasingly activist role of the courts, may produce a smoother avenue for judicial intervention. The cases outlined below represent some of the state and federal court directions in accreditation intervention.

In the case of State ex rel. School District No. 29 et al. v. Mooney, 59 Pacific 2d, 48 (1936), the State of Montana, acting on behalf of the plaintiff school district sought a mandamus to compel the State Board of Education to accredit the school district pursuant to statutory and administrative rules and regulations. The District Court issued the writ and defendants appealed to the Supreme Court of Montana which reversed the lower court and found for the defendant State Board of Education. The key issue in the case was whether or not the school district could compel the State Board to accredit the district absent proof that the plaintiff district had complied strictly with the required standards and procedures. The high court held that mandamus might lie but only upon proof that the accreditation terms and conditions had been fully met and that the Board's denial of the status was an arbitrary, capricious exercise of its discretion. In finding for the defendant, the court noted (at p. 54):

> "Even if the state board be compelled to grant a hearing, it cannot be compelled to accredit the ... school unless it be clearly shown that the denial of the application ... by the state board would be an arbitrary or capricious act. The writ [of mandamus] will lie to compel the board to act, and exercise its discretion, _but not to direct its conclusions nor the judgment it shall reach_ ..." (emphasis added)

The legal consequences of the removal of a member college from the association's list of accredited members was the subject of suit in the federal courts. In the case of _State of North Dakota_ v. _North Central Association of Colleges and Secondary Schools_ et al., 99 F. 2d 697 (1938), the plaintiff state sought to enjoin the defendant accrediting body from removing the University of North Dakota and the State Agricultural College of North Dakota from the Association's list of accredited institutions. The federal District Court denied plaintiff's motion for a temporary injunction and the plaintiff appealed. The plaintiff state, through an appropriate agency, dismissed without cause or hearing several staff members of the State College. This action, contrary to the policies and rules of the North Central Association resulted in an ultimate decision by the Association to remove the State College from the accredited list. Without appealing this decision to the North Central Executive Committee (as was its right), plaintiff state, on behalf of the member State College, filed suit. In affirming the District Court's opinion in favor of the Association, this court noted, (a) that the State College had not exhausted the remedies provided in the Association's rules, (b) the State of North Dakota (a nonmember) could assert no greater rights than the member State College, and (c) the District Court properly held that it had no jurisdiction over the controversy since the remedies provided by the Association had not been exhausted. The Court commented on the nature of associational relations (at p. 700):

> "The Association being purely voluntary is free to fix qualifications for membership; and to provide for termination of membership of institutions which do not meet the standards fixed by the Association. The constitution, by laws, and rules of government of the Association measure the rights and duties of the members."

Until the Association remedies have been exhausted, the Court refrained from any consideration of the nature of the hearing, its possible conclusion or the consequences. In laymen's language, the Court told the plaintiff, "You cried 'foul' prematurely; play the game to its conclusion before asking for judicial remedy."

The Illinois courts have taken a different view of the rights of state-approved schools removed from a list of schools approved by a state agency. In the case of Northwestern Institute of Foot Surgery and Chiropody v. Frank G. Thompson, Director of the Department of Registration and Education, et al., 326 Ill. App. 439 (1945), the plaintiff proprietary school was removed from the list of approved schools after a finding of noncompliance with state regulations concerning staff personnel. The school sought to have the decision reviewed and the Circuit Court found for defendants. On appeal, the Appellate Court found no evidence that reasonably informed the school of its alleged noncompliance nor did the removal order recite evidence of facts justifying the state's conclusion that the school failed to meet the minimum requirements. From the decision, it seems clear that the school's right to remain on the approved list could be terminated only by the state's carrying the burden of proof to justify its removal action.

Two cases growing out of a state board's denial of accreditation (or recognition inasmuch as the terms mean the same thing in these cases) to a school district's proposed high school reflect the judicial reluctance to deny discretionary judgment in the state accrediting process. The first case, State of Washington ex rel. School District No. 7 v. Bruno, 384 P. 2d 608 (1963) raised the question of whether the state's refusal to accredit a proposed high school on the grounds of inadequate demonstration of need for same in the face of the district's compliance with prescribed standards was arbitrary and capricious. The Supreme Court of Washington noted that, despite the district's apparent compliance with prescribed academic, personnel, and facility standards, the state board of education was justified in denying the district's application for accreditation on the factors of necessity, economic effect, and future planning. The state board's decision was not purely ministerial and its authority and responsibility for accreditation includes a duty to consider factors other than those standards specifically spelled out in the accreditation rules. The Court defined accreditation as (p. 613):

> "Accreditation, in addition to being a badge of academic proficiency and a factor in the classification of districts, is also made a qualification for participation in ... the common school fund."

In holding for the defendant state, the Court observed that it was persuaded that the legislature did not intend that the board's examination for accreditation purposes be limited to purely ministerial determination of whether the district met prescribed standards; rather, the legislature intended the state board to consider the standards together with an over-all evaluation of such factors as necessity, economic effect, and future planning.

The plaintiff district, despite the adverse ruling, apparently implemented its proposed school plans, later reapplied for approval and accreditation, was again turned down by the board, and filed suit again (DuPont-Fort Lewis Dist. No. 7 v. Bruno, 79 Wash. 2d 736, 489 P. 2d 171 (1971), charging that the state board's denial was arbitrary, capricious, and discriminatory against district students and taxpayers. On the districts subsequent applications, the state board's denial was based on the lack of need for the school and that expenditure of federal and state funds for the construction and operation of the school was unreasonable and not in the public interest. In holding for the state board, the Court restated its earlier finding that the board is entitled to consider non-academic factors in reaching it discretionary judgment as to accreditation.

One other state case needs brief mention. The case of Lewis Consolidated School District v. Johnston, 127 N. W. 2d 118 (1964), grew out of the Iowa State Superintendent of Public Instruction's threat to remove the plaintiff district from the list of state-approved schools and thereby terminate its right to share in state funds. Plaintiff's alleged, inter alia, that the statute authorizing the State Superintendent to "formulate standards, regulations, and rules, subject to the approval of the state board, for the approval of all school ... under his supervision ..." and to remove schools not in compliance therewith was an improper and unconstitutional delegation of legislative power by the state legislature. In holding the statute delegating rule-making power to the State Superintendent unconstitutional, the Court noted that the 71 standards imposed by the Superintendent without legislative standards (other than the admonition that he "must keep within the law") bestowed arbitrary powers upon an administrator and was an unlawful delegation of legislative powers.

Two recent and well-known cases in the federal courts outline some important areas of law as operative in voluntary accrediting associations' relations and decisions. The first, Parsons College v. North Central Association, 271 F. Supp. 65 (1967), arose from North Central Association's (NCA) decision to remove the plaintiff college from membership following the NCA usual procedures of an examining team visit, report, review by an appropriate NCA committee, a removal decision by the Executive Board, and a unanimous vote by the NCA Commission on Colleges and Universities to accept the Executive Board's recommendation to drop Parsons College from membership (which was tantamount to removing accreditation). A few days prior to the effective date of membership removal, Parsons College sought to enjoin NCA's removal of it for membership. Without detailing the highly-publicized facts, all of which centered around the college's alleged failure to remedy specified educational shortcomings, the substantive issues and court response deserve mention. The college established the fact that removal from membership (or disaccreditation) would work irrevocable harm but the issuance of an injunction, according to the Court, must be based on defendant's wrongdoing. As to the issue of due process, the Court found the constitutional protection inapplicable here inasmuch as the proposed action by NCA was private, rather than governmental action against which the due process clause of the 14th amendment grants protection. On that point the Court noted (p. 70):

> "The termination of membership in a private association, organized to maintain the standards in a profession or calling, do not ... present a federal question."

The law governing membership in private associations is the law (rules of the association) which the members agreed to when they voluntarily choose to join the association. The plaintiff's complaint of the absence of "rudimentary due process" was not supported by the NCA procedures or the facts presented. The plaintiff argued that the standards by which it was judged were "nebulous and vague" and that it had no notice of specific misconduct prior to the removal decision. The Court noted that (p. 72) "In this case, the issue was not innocence but excellence" and the standards for ascertaining academic failure are different in kind than those to sustain academic misconduct. The NCA purpose, policies, and procedures were consistent with its rendering membership judgments. Finally, as to the contention that the NCA reached an arbitrary conclusion, the Court noted (p. 74):

> "In this contention, the College questions the adequacy of the reasons given for withdrawing its accreditation. In this field, the Courts are traditionally even more hesitant to intervene. The public benefits of accreditation, dispensing information and exposing misrepresentation, would not be enhanced by judicial intrusion. Evaluation by peers of the college, enabled by experience to make comparative judgments, will best serve the paramount interest in the highest practicable standards in higher education. The price for such benefits is inevitably some injury to those who do not meet the measure, and some risk of conservatism produced by appraisals against a standard of what has already proven valuable in education. The association has achieved its power through the respect it has engendered through its work. If it fails to satisfy its members, they are free to join another group."

Plaintiff's motion for a preliminary injunction was denied. Thus the Court restated the traditional reluctance by the judiciary to intervene in the internal affairs of private, voluntary associations.

The case of Marjorie Webster Junior College, Inc. v. Middle States Association of Colleges and Secondary Schools, Inc., 432 F. 2d 650 (1970), cert. denied 915 Ct. 367 (1970), arose from the defendant association's refusal to consider plaintiff college for membership for the reason that defendant's rules bar eligibility to for profit institutions. The Federal District Court held that the defendant's rule of eligibility was arbitrary and unreasonable, in violation of antitrust laws as inhibiting the colleges' ability to compete in the field and as not furthering the stated objectives of the defendant association. Defendant appealed and the Court of Appeals reversed the lower court, finding for defendant. The Court held that the Sherman Act was not applicable in this instance. The Court did note, however, (pp. 654-655):

> "It is possible to conceive of restrictions on eligibility for accreditation that could have little other than a commercial motive; and as such, antitrust policy would presumably be applicable. About such motives, however, the process of accreditation is an activity distinct from the sphere of commerce; it goes rather to the heart of the concept of education itself."

The Court further held that judicial intervention was not warranted absent a showing, (a) of deprivation of any professional advantage in the application of the membership rule to the plaintiff college, or (b) that the association exercised such monopoly power that its standards for accreditation could be subjected to plenary judicial review, and (c) that the membership restriction was without reasonable basis even if the association activities and federal recognition rendered them state action subject to constitutional limitations. The defendant association prevailed but the opinion raised some obvious signals for the future of accrediting activity. The Court noted the increasing importanct of private associations in the affairs of individuals and organizations (at p. 655) and observed that, despite the special evaluation competence possessed by professional societies, courts have reviewed association standards where membership in, or certification by such societies, is a virtual prerequisite to the practice of a given profession. As to the association's standards, they must be reasonable, applied with an even hand, and not in conflict with the public policy of the jurisdiction. The Court restated the proposition that judicial regulation of standards set by private professional associations must be related to the necessity for intervention, but went on to say (pp. 655-656):

> "In particular, the extent to which deference is due to the professional judgment of the association will vary both with the subject matter ... and the degree of harm resulting from the association's action."

The Court agreed with the association that proprietary institutions, with clearly a profit objective, should be measured by standards other than those applicable to the association's other members. Finally, the Court assumed, without deciding, that the defendant's relations with government might subject its actions to constitutional limitations, but here failed to find any evidence that the defendant's refusal to consider the college for membership was without reasonable basis. It seems clear that this Court, given the proper set of facts, would have little difficulty in subjecting an accrediting body to judicial review as to antitrust policy and constitutional limitations. The possibility of the application of monopoly legislation increases as the efficacy and consequences of membership in accrediting bodies escalate in institutional and public policy realms.

Title VII of the Civil Rights Act of 1964 and the employment guidelines promulgated by the Equal Employment Opportunities Commission bear pointedly on the teacher credentialling process. Although the full impact of these regulations on teacher preparation programs and certification requirements are not yet clear, a growing body of literature[38], coupled with the landmark case of

Griggs v. Duke Power Company, 401 U.S. 421 (1971) and its progeny (e.g. Baker v. Columbus, 462 F.2d 1112 [1972] and Armstead, et al. v. Starkville, 461 F.2d 276 [1972] and Chance v. Board of Examiners, 458 F. 2d 1167 [1972]) challenge the traditional "screening functions" and employment qualifications in the teaching profession. Specifically, in Griggs, the U.S. Supreme Court prohibited the employer's use of unvalidated tests and educational requirements in the selection of its employees inasmuch as the effect of the requirements was discriminatory. The EEOC Guidelines for Employee Selection, cited by the Court in Griggs, provided three ways to validate selection criteria: content, construct, and predictive validation. The shift of the burden of proof to the employer, once discriminatory effect of the employment requirements is shown by the applicant, seems to carry serious implications for many licensing and credentialing requirements for teachers. The job-relatedness of teacher certification requirements may be difficult to document and credentialing reformers would be well advised to look carefully at the validity and job-relatedness of any mandated qualifications for entry and retention in the teaching profession.

Some implications for accreditation and certification

The concern for more effective accreditation and certification procedures raises the possibility of increased government and judicial regulations of private and public action. The Court's traditional reluctance to intervene in accrediting bodies affairs seems weakened by the increased importance attached to membership in private accrediting associations and the seriousness of the consequences of membership. With the expanded federal role in recognition under federal-aid legislation and the consequent reliance on accreditation as a key element in disbursement machinery, accrediting bodies may experience mixed emotions as they are alternately courted and flattered and regulated indirectly by federal agencies. This changed climate of government regulation, particularly court intervention, was summed up in the opinion in Falcone v. Middlesex County Medical Society, 34 N. J. 582, 170 A. 2d 791 (1961), wherein the Court noted (at p. 799):

> "When courts originally declined to scrutinize admission practices of membership associations they were dealing with social clubs, religious organizations, and fraternal associations. Here the policies against judicial intervention were strong and there were no significant countervailing policies. When the courts were later called upon to deal with trade and professional associations exercising virtually monopolistic control, different factors were involved. The intimate personal relationships which pervaded the social, religious and fraternal organizations were hardly in evidence and the individual's opportunity of earning a livelihood ...appeared as the controlling policy consideration."

From the data reviewed here, a number of policy implications or signal directions emerge:

1. The barriers to federal regulation of private, voluntary accreditation appear to be lowering as the importance of and public interest in accreditation decisions and consequences escalate. The paradox may be that more effective action by accrediting bodies in persuading the public of their use and value in protecting standards in education may push the process closer to monopoly control and thus into the arms of antitrust legislation. There is nothing sacrosanct about education as a proper subject for governmental or judicial regulation.
2. As the consequences of denial or removal of membership in accreditation associations become more serious to applicants and members, the need for fair, even-handed, equitable procedures becomes more urgent. Even short of association activities falling under the constitutional restraints on state or government action, judicial attention to the rudimentary fairness of internal rules and procedures will push associations toward de facto due process safeguards. Associations and government agencies would be wise to review accreditation certification, and recognition procedures, rules, and guidelines to guard against any con-

stitutional offenses.

3. The growing public concern over educational accountability, however defined and in whatever form it is manifest, could challenge seriously the private, voluntary associational posture of autonomy as the highest form of assurance of educational quality. The burden clearly is on the accrediting bodies to demonstrate that, (a) they can separate the ept from the inept institutions and programs, and (b) they have the capacity and the courage to act in the public interest as to quality education. The interests in consumer protection and ethical practices underlying the recent federal government's proposed extension of recognition activities[39] may be transitory but they could be real enough to persuade Congress that things west of the Potomac are in chaos and darkness.
4. The accreditation process, even in voluntary, private associations must reflect the fundamental fairness and procedural safeguards against arbitrary, capricious judgments sought to be protected against by the due process concept in constitutional law. Although the courts continue to regard voluntary accreditation activities as essentially non-government actions (and thus outside the intent of the 14th Amendment to the Constitution), the increasing power and functional monopoly of accrediting bodies, coupled with clear-cut government use of the associations could persude the courts to find a base for application of due process requirements to the accrediting procedures.
5. The development of explicit, validated, job-related requirements for teachers and administrators appears to be top priority in any reform

of professional credentialing processes. The differential interests of the state, the credential applicants, the client school children and parents, and higher education must be meshed in satisfactory constrasts of selection, training, and licensing to achieve legitimate public goals through legally-defensible means.

6. There is little doubt, apparently, that regulations aimed at quality control in education enterprise are needed and appropriate; the debate now centers about the most effective and politically acceptable source of regulation--public or private agencies. The schools, colleges, and universities--whether public or private, non-public, proprietary or not for profit--have a substantial stake in the issues and ignore the debate at their distinct peril.

NOTES

1. Selden, Accreditation: A Struggle Over Standards in Higher Education 6 (1960)

2. The statutory language reads (describing the powers and duties of State Superintendent of Education): "To determine for all types of schools conducted under this Act efficient and adequate standards for (*inter alia*) the physical plant, instruction and teaching, curriculum, administration and supervision and to grant certificates of recognition to schools meeting such standards. ..."

3. William A. Kaplan and J. Phillip Hunter, "Comments: The Legal Status of the Educational Accrediting Agency: Problems in Judicial Supervision and Governmental Regulation", 52 Cornell Law Quarterly 104 (1966)

4. *Ibid*. p. 127

5. 79 Stat. 1251 (1965), 20 U.S.C. § 403 (b) (Supp.I 1965) (national defense loans and fellowships under the Higher Education Resources and Student Assistance Act). See also 79 Stat. 1247 (1965), 20 U.S C. § 1085 (a) (5) (A) (Supp.I 1965); 77 Stat. 376 (1963), 20 U.S.C. § 751 (f) (5) (1964).

6. 79 Stat. 1247 (1965), 20 U.S.C. § 1085 (a) (Supp.I 1965) (reduced student loan insurance under Higher Education Resources and Student Assistance Act): If the Commissioner determines that ... there is no nationally recognized accrediting agency or association qualified to accredit schools in a particular ... category, he shall, pending the establishment of such an accrediting agency or association, appoint an advisory committee, composed of persons specially qualified to evaluate training provided by schools in such category, which shall (i) prescribe the standards of content, scope, and quality which must be met in order to qualify schools in such category to participate in the program pursuant to this part, and (ii) determine whether particular schools ... meet those standards.

7. See Philip W. Semas, "Is Uncle Sam Muscling In?", *The Chronicle of Higher Education*, vol. XI, no. 14, (December 15, 1975), p. 1.

8. 20 U.S.C. 403 (b), 1085 (b), 1141 (a), 1248 (11), and Sec. 438 (b) of the Higher Education Act of 1965, Pub. L. 89-329 as amended by Pub. L. 92-318, 86 Stat. 235, 264 (20 U.S.C. 1087-1(b)).

9. See Part 149 (A) sec. 149.1, Federal Register, Vol. 39, No.162 - Tuesday, August 20, 1974.

10. *Ibid*, sec. 149.6.

11. *Ibid*, Subpart B.

12. *Ibid*, secs. 149.23 and 149.24.

13. *McCulloch* v. *Maryland*, 4 Wheaton (U.S.) 316; 4 L. Ed. 579 (1819).

14. Chafee, "The Internal Affairs of Associations Not for Profit", 43 Harvard Law Review, 993, 1027 (1930).

15. Kaplan and Hunter, *op.cit* p. 105.

16. American Association of Junior Colleges, American Association of Land Grant Colleges and State Universities, Association of American Colleges, Association of American Universities, Association of State Colleges and Universities, Association of Urban Universities, and the State Universities Association.

17. Subpart B, Sec. 149.20, Commissioner's Recognition Procedures for National Accrediting Bodies and State Agencies, Federal Register, Vol. 39, no. 162, August 20, 1974.

18. Article 21, Chapter 122, Illinois Revised Statutes.

19. State Board of Education, Circular Series A, Number 160, Chapter IX. "Standards Governing Preparation of Professional Personnel", 1974, and "The Illinois Program for Evaluation, Supervision, and Recognition of Independent, Parochial, and Private Schools", Circular Series A, No. 160 (5), 1967.

20. Section 21-13, Chapter 122, Illinois Revised Statutes. This board, created by statute in 1963, is composed of 11 members appointed to 3-year terms by the State Superintendent of Education and issues teaching credentials to qualified applicants.

21. Section 21-21, Chapter 122, Illinois Revised Statutes.

22. Harold Orlans, H. Jean Levin, Elizabeth K. Bauer, and George Arnstein, *Private Accreditation and Public Eligibility*, October, 1974.

23. Section 34-83, Chapter 122, Illinois Revised Statutes. This statute, evolved from the Otis Act of 1917, authorizes the Board of Education of the City of Chicago to establish "A board of 3 examiners who shall examine all applicants required to hold certificates to teach and the board of education shall issue gratuitously to those who pass a required test of character, scholarship and general fitness, such certificates to teach as they are found entitled to receive."

24. Article 21, Chapter 122, Illinois Revised Statutes.

25. State Board of Education, Circular Series A, Number 160, Chapter IX.

26. Except for the Certificate in Early Childhood (2 years), Provisional Certificate (2 years), Temporary Certificate for Teachers of Trainable Mentally Handicapped (1 year), all teaching and administrative certificates are for 4-year, renewable terms.

27. Illinois currently issues the following 15 certificates: Provisional vocational certificate, provisional foreign languate certificate, early childhood certificate, elementary school certificate, special certificate, high school certificate, elementary supervisory certificate, all-grade supervisory certificate, administrative certificate, junior college certificate, provisional certificate, temporary certificate for teachers of trainable mentally handicapped, substitute certificate, general certificate, and school service personnel certificate.

28. Section 21-14, Chapter 122, Illinois Revised Statutes.

29. Section 21-21, Chapter 122, Illinois Revised Statutes.

30. Ibid.

31. Section 21-23, Chapter 122, Illinois Revised Statutes. Causes for suspension or revocation are: immorality; a condition of health detrimental to the welfare of pupils, incompetency, unprofessional conduct, neglect of any professional duty, or other just cause. Unprofessional conduct shall include refusal to attend or participate in, institutes, teachers' meetings, professional readings, or to meet other reasonable requirements of the county superintendent of schools or the State Superintendent of Education and shall also include neglect or unnecessary delay in making statistical and other reports required by school officers.

32. Section 264 et. seq., Chapter 110, Illinois Revised Statutes.

33. Section 21-24, Chapter 122, Illinois Revised Statutes.

34. Art. 10, sec. 1 of the 1970 Constitution of the State of Illinois, which reads in part, "The State shall provide for an efficient system of high quality public educational institutions and services."

35. Art. 10, sec. 2, Illinois State Constitution of 1970.

36. Kaplan and Hunter, op.cit., p. 106

37. Kaplan and Hunter, op.cit., p. 109

38. See, for example, Laurence D. Freeman, "Legal Constraints: Licensing, Accreditation, and Equity in Teacher Education" in a forthcoming final report of the Study Commission on Undergraduate Education and the Education of Teachers, University of Nebraska Press (in press) and Sheila Huff, "Credentialing by Tests or by Degrees: Title VII of the Civil Rights Act and Griggs v. Duke Power Company," Harvard Educational Review, vol. 44, no. 2, May, 1974, pp. 246-269.

39. See, for example, Toward a Federal Strategy for Protection of the Consumer of Education: Report of the Subcommittee on Educational Consumer Protection. DHEW, Washington, D.C., July, 1975. This report, prepared by the Federal Interagency Committee on Education, composed of representatives of 30 federal government agencies, including 5 observer agencies, dealt primarily with consumer problems and needed consumer protections at various levels in the education system. Among the "major actions" recommended by the report were: (a) full disclosure by schools of student/consumer rights and obligations under federal programs, (b) the creation of a Federal Student Tuition Insurance Corporation to protect students and their tuition when postsecondary schools close, and (c) institutional eligibility for federal funds should be contingent upon full disclosure of dropout rates, course completion rates, pro-rata tuition refund policy, and other consumer protection mandates.

APPENDIX A

EXCERPTS FROM PROPOSED ELIGIBILITY LEGISLATION

ELIGIBILITY OF INSTITUTIONS

Section 13 of the bill contains a number of amendments and new provisions relating to institutional eligibility.

Subsection (a) would add a new section on eligibility of institutions to the general provisions relating to student assistance programs. The new provision would require each institution or school participating in any student aid program under Title IV to (1) permit the Secretary and Commissioner to have access to records of the institution as necessary to audit the program and otherwise ensure compliance with applicable requirements, (2) comply with reasonable standards of financial responsibility and administrative capability as prescribed by regulations of the Commissioner, and (3) comply with regulations of the Commissioner designed to provide protection to students as consumers.

The new provision would authorize the Commissioner to issue appropriate regulations providing for the limitation, suspension, or termination of institutions or schools failing to comply with applicable statutory and regulatory requirements. He would also be required to publish a list of State agencies which he determines to be reliable authority as to the quality and ethical practices of public, private nonprofit, and proprietary postsecondary vocational educational institutions in their respective States.

The above-described provisions would supersede the authority presently contained in section 438 of the Act and would expand that authority to cover all student assistance programs in title IV. Therefore, subsection (b) of section 12 would repeal section 438.

Subsection (c) of section 11 would modify the definition of "institution of higher education", as it applies to student assistance programs in title IV, by including those institutions which admit individuals who are beyond compulsory school age in the State and who can benefit from the instruction offered (whereas present law requires that the institution admit only high school graduates or equivalent). The definition of "institution of higher education" in section 1201(a) of the Act, which is applicable to all Higher Education Act programs, would be amended to authorize the National Advisory Committee on Accreditation and Institutional Eligibility to be an alternative eligibility source for schools for which there is no State or nationally recognized accrediting agency or association. With the amendments in subsection (c), the definition of "institution of higher education" in title XII would be identical with that provided for the Guaranteed Student Loan program in section 435(b), and the bill would therefore repeal that provision.

NATIONAL ADVISORY COMMITTEE ON ACCREDITATION AND INSTITUTIONAL ELIGIBILITY

Section 20 of the bill would establish in the Office of Education a National Advisory Committee on Accreditation and Institutional Eligibility. The Committee would consist of 15 members appointed by the Secretary for staggered terms. The functions of the Committee would include (1) advising the Commissioner with regard to the recognition of accrediting agencies and associations, (2) advising the Commissioner on the development of criteria for such recognition, (3) advising the Commissioner with regard to formulation of policy on institutional eligibility, (4) advising the Commissioner with regard to State agencies designated as reliable authorities on the quality of postsecondary education in their States, (5) developing standards and criteria for institutions of higher education and vocational schools for which there are no recognized accrediting agencies, (6) making appropriate legislative recommendations, (7) advising the Commissioner with regard to developments in the accreditation process, and (8) advising the Commissioner with regard to his responsibilities in relation to the award of degree-granting status to Federal agencies and institutions.

This provision would provide clear statutory authority for such an advisory committee, which would replace the Accreditation and Institutional Eligibility Advisory Committee which was established by the Secretary in 1974. Under section 442 of the General Education Provisions Act, that Committee can exist for only two years without statutory authority. The provision in this bill would provide the necessary authority to continue the Committee for the duration of the programs authorized by the bill.

ELIGIBILITY OF INSTITUTIONS

Sec. 13. (a) (1) Subpart 1 of part F of title IV of the Act is amended by adding at the end thereof the following new section:

ELIGIBILITY OF INSTITUTIONS

"Sec. 498A. (a) In order to be eligible to participate in any program assisted under this title, an institution of higher education, vocational school, or other institution, in addition to meeting any other requirements applicable to such program, must--

"(1) permit the Secretary or Commissioner (or duly authorized representative thereof) to have such access to the financial, attendance, admission, and other records of the institution or school as may be necessary (A) to perform a fiscal audit with regard to any funds obtained from a student who has received a grant, loan, or other benefit provided or insured under this title or (B) to determine compliance by the institution or school with any statute, regulation, or other standard or requirement relating to participation in the program:

"(2) comply with such reasonable standards of financial responsibility and appropriate institutional capability, as the Commissioner may prescribe by regulation, for the administration of the program or programs of student financial aid authorized under this title; and

"(3) comply with such regulations as the Commissioner may prescribe with respect to maintenance of student records; public disclosure of statistics relating to the performance of the institution or school and graduates thereof; standards of ethics for advertising, recruiting, and enrolling students; and establishment of a fair and equitable refund policy.

"(c) The Commissioner shall issue such regulations as he deems appropriate providing for the limitation, suspension, or termination of the eligibility under this part of any institution of higher education, vocational school, or other institution otherwise eligible to participate in programs under this title whenever he determines, after affording notice and opportunity for a hearing, that such institution or school has violated or failed to carry out any provision of this title, any other applicable statutory provision, or any regulation prescribed under this title.

"(d) The Commissioner shall publish a list of State agencies which he determines to be reliable authority as to (1) the quality of public, private nonprofit, and proprietary postsecondary vocational educational institutions and schools in their respective States, and (2) the ethical practices (as defined by regulations of the Commissioner) of such institutions and schools, for the purpose of determining eligibility for all student assistance programs."

(b) Section 438 of the Act is repealed.

(c) (1) Section 491(b)(1) of the Act is amended by striking out "except subpart 5 of part A, except subpart B,".

(2) Section 491 (b)(1) of the Act is amended by adding at the end thereof the following new sentence:

"Such term also includes a public or nonprofit private educational institution in any State which, in lieu of the requirement in section 1201 (a) (1), admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution if located and who have the ability to benefit from the training offered by the institution,".

(3) Section 1201(a) of the Act is amended by inserting after the second sentence the following new sentence: "If the Commissioner determines that a particular institution or school does not meet the requirements of clause (5) because there is no nationally recognized accrediting agency

or association, authorize the National Advisory Committee on Accreditation and Institutional Eligibility (established pursuant to section 1207) to (A) prescribe the standards of content, scope, and quality which must be met in order to qualify schools in such category to participate in the programs authorized by this Act, and (B) determine whether particular schools not meeting the requirements of clause (5) meet those standards.".

(4) The last sentence of section 1201(a) of the Act is amended by inserting immediately before the period at the end thereof the following: "and as to the ethical practices (as defined by regulations of the Commissioner) of the institutions or schools offering such training".

(5) The last sentence of section 435(c) of the Act is amended by inserting immediately before the period at the end thereof the following: "and as to the ethical practices (as defined by regulations of the Commissioner) of the institutions or schools offering such education or training".

(6) Subsections (b), (d), and (e) of section 435 of the Act are repealed.

NATIONAL ADVISORY COMMITTEE ON ACCREDITATION AND INSTITUTIONAL ELIGIBILITY

Sec. 20. Title XII of the Higher Education Act of 1965 is amended by adding at the end thereof the following new section:

"NATIONAL ADVISORY COMMITTEE ON ACCREDITATION AND INSTITUTIONAL ELIGIBILITY

"Sec. 1207. (a) There is established in the Office of Education a National Advisory Committee on Accreditation and Institutional Eligibility which shall be composed of 15 members appointed by the Secretary upon nomination by the Commissioner, from among individuals (1) knowledgeable of secondary and postsecondary education, (2) representative of students and youth, (3) representative of professional associations, (4) representative of State educational agencies, and (5) representative of the general public. The Chairman of the Committee shall be appointed by the Secretary.

"(b) The term of office of each member of the Committee shall be three years, except that--

"(1) the members first appointed to the Committee shall serve as designated by the Secretary, five for a term of one year, five for a term of two years, and five for a term of three years; and

"(2) any member appointed to fill a vacancy occuring prior to the expiration of the term for which his predecessor was appointed shall be appointed for the remainder of that term.

"(c) The Committee shall--

"(1) advise the Commissioner with regard to his responsibility for the recognition and designation of nationally recognized accrediting agencies and associations;

"(2) advise the Commissioner with regard to the development of criteria and procedures for recognition and designation of accrediting agencies and associations;

"(3) advise the Commissioner with regard to the formulation of policy relating to institutional eligibility;

"(4) advise the Commissioner with regard to his responsibility to designate State agencies as reliable authorities on the quality of postsecondary educational institutions and schools in their respective States;

"(5) develop and submit to the Commissioner for approval, standards and criteria for specific categories of vocational training institutions and institutions of higher education for which there are no recognized accrediting agency or institution, in order to establish the eligibility of such institutions for participation in Federally-funded programs;

"(6) review existing legislation affecting the Commissioner's responsibility with regard to accreditation and institutional eligibility and suggest appropriate revisions, if any;

"(7) review, and advise the Commissioner with regard to developments in the accreditation process in all levels of education;

"(8) advise the Commissioner with regard to his responsibilities in relation to the award of degree-granting status to Federal agencies and institutions; and

"(9) carry out such other functions relating to accreditation and institutional eligibility as may be assigned by the Commissioner.

"(d) The Committee shall meet not less than twice each year at the call of the Chairman. The date of, and agenda for, each meeting of the Committee shall be submitted in advance to the Commissioner for his approval. A representative of the Commissioner shall be present at all meetings of the Committee.

"(e) The Committee shall, not later than November 30 of each year, make an annual report to the Congress, through the Commissioner, the Assistant Secretary for Education, and the Secretary. The annual report shall contain a list of the members of the Committee and their addresses, a list of the Committee's functions, a list of dates and places of each meeting during the preceding fiscal year, and a summary of the activities findings, and recommendations made by the Committee during the preceding fiscal year.".

"(f) Subject to section 448(b) of the General Education Provisions Act, the Committee shall continue to exist until September 30, 1979."

Title 45—Public Welfare

CHAPTER I—OFFICE OF EDUCATION, DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

PART 149—CRITERIA FOR RECOGNITION OF NATIONAL ACCREDITING BODIES AND STATE AGENCIES

Notice of proposed rulemaking with respect to criteria and procedures for recognition of Nationally Recognized Accrediting Agencies and Associations as reliable authorities concerning the quality of education or training offered by educational institutions or programs was published in the FEDERAL REGISTER on March 1, 1974 (39 FR 7946). Interested persons were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking.

The notice of proposed rulemaking also indicated that the effectiveness of these criteria will be closely monitored during the first year of their implementation. Thereafter, no later than June 1975, the Commissioner of Education intends to propose such further revisions of these criteria as are appropriate in light of this review and other ongoing studies and reports dealing with accreditation and institutional eligibility.

Notice of proposed rulemaking with respect to criteria and procedures for recognition of State Postsecondary Vocational Education Agencies for accreditation of public postsecondary vocational institutions or programs was published in the FEDERAL REGISTER on November 30, 1973 (38 FR 33089). Interested parties were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking. No comments were received with respect to the criteria for recognition of State postsecondary vocational education agencies.

A. *Summary of Comments—Office of Education Response.* The following comments were received by the Office of Education regarding the proposed criteria and procedures for recognition of Nationally Recognized Accrediting Agencies and Associations. After a summary of each comment, a response is set forth stating the reasons why no change is deemed necessary prior to field testing the criteria.

1. Section 149.1 *Scope—Comment.* A commenter suggested addition of a policy declaration regarding support by the Office of Education of voluntary accreditation. The same commenter suggested addition of a policy statement regarding State and local control over education.

Response. Policy declarations are not directly germane to regulations such as are set forth in the proposed revised Criteria. The Office still adheres to the policy regarding support of voluntary accreditation, however. The statement regarding State and local control over education is not relevant to the criteria inasmuch as these criteria pertain only to accrediting bodies and not to educational institutions.

2. Section 149.2 *Definitions—Comment.* A commenter suggested substitution of the word "educational" in place of "public" with reference to accreditation.

Response. Despite the fact that accreditation is conducted by private organizations, it is an activity which serves the public.

3. Section 149.5 *Initial recognition; renewal of recognition—Comments.* Two commenters suggested changing the review cycle from four to five, or six years.

Response. Comments received during the period of drafting the criteria recommended review periods ranging from two to ten years. In view of a lack of consensus on this matter, the U.S. Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility recommended continuation of the four-year cycle at this time.

4. Section 149.6(a) *Functional aspects—Comments.* Specific comments were received regarding three subsections of 149.6(a). The comments and responses follow:

Comment. One commenter sought deletion of the requirement to include on visiting teams at least one person who is not a member of the agency's policy or decision-making body or its administrative staff.

Response. This provision is retained in order to protect against conflict of interest situations, where policy, consulting, and decision-making functions are placed in the hands of a small group of individuals. It does not refer to the use of "lay" persons on visiting teams, but rather competent, knowledgeable peers who are not themselves directly involved in the final decision rendered by the accrediting body.

Comment. A commenter suggested addition of a requirement for self-study by accrediting agency staff.

Response. In the judgment of the Office of Education, agency self-study is clearly implicit in the process of preparing a petition for recognition or renewal of recognition.

Comment. A commenter said that there was need for increased specificity regarding the self-analysis requirement.

Response. Accrediting agencies reviewed by the Office cover the increasingly broad spectrum of postsecondary education. This criteria therefore touches only upon what the Office has determined from experience to be the essentials of the process. Variations in the self-analysis process, such as the inclusion of quantitative material and cooperation with other agencies, are left up to individual accrediting agencies.

5. Section 149.6(b) *Responsibility—Comments.* Several comments were received regarding various subsections of 149.6(b). The comments and responses follow:

Comment. Two commenters asked for the deletion of the requirement regarding inclusion of public representatives in the accreditation process.

Response. This provision is retained because, in protecting and advancing the interest of quality education, institutional and program accrediting serve the public interest. There is no reason to fear that by adding a more generalized point of reference, the accreditation process would be made any less insightful. The public component is a complement to the essential professional judgments made in the accreditation review, not a replacement for them.

Comment. Two commenters suggested deletion of the requirement that the current accreditation status and the date of next review be published.

Response. Inasmuch as accreditation serves a public function, the public, prospective students, and employers should be apprised of all institutions which have less than "fully approved" status.

Comment. One commenter suggested revision of the requirement regarding opportunity to comment on revised accreditation standards to provide for such activity to take place through "member institutions."

Response. Accreditation affects other elements of society than educational institutions. Comments from these other elements should flow directly to the accrediting agency without running the risk of dilution or misinterpretation by educational institutions.

Comment. One commenter called for the deletion of the provision for evaluations, other than initial ones, to be carried out without the invitation of the executive officer of the institution.

Response. This provision is retained because it permits accrediting agencies to investigate possible violations of their standards in a timely and effective manner.

Comment. One commenter suggested deletion of the requirement for fostering of ethical practices, such as nondiscrimination and fair tuition refunds.

Response. Since the functions of accrediting agencies affect the public, the agencies should demonstrate responsibility in such areas as discrimination and financial responsibility.

Comment. One commenter suggested the addition of a requirement that accrediting agencies furnish the institution a list of proposed visiting team members and afford the institution the right to accept or reject an individual as a proposed examiner.

Response. This suggestion appears to have reasonable validity, and currently a number of accrediting agencies have such a policy. The Office wishes to consider further whether or not to add this requirement to the criteria.

After consideration of the above comments, Part 149 of Title 45 of the Code of Federal Regulations is amended to read as set forth below.

Effective date. Pursuant to section 431 (b) of the General Provisions Act (20 U.S.C. 1232(b)), these regulations become effective August 20, 1974.

Dated: August 15, 1974.

T. H. BELL,
U.S. Commissioner of Education.

Approved: August 16, 1974.

CASPAR W. WEINBERGER,
Secretary of Health, Education, and Welfare.

PART 149—COMMISSIONER'S RECOGNITION PROCEDURES FOR NATIONAL ACCREDITING BODIES AND STATE AGENCIES

Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

Sec.
149.1 Scope.
149.2 Definitions.
149.3 Publication of list.
149.4 Inclusion on list.
149.5 Initial recognition; renewal of recognition.
149.6 Criteria.

AUTHORITY: (20 U.S.C. 403(b), 1085(b), 1141(a), 1248(11)); (42 U.S.C. 293a(b), 295f-3(b), 205h-4(1)(D), 298b(f)); (8 U.S.C. 1101(a)(15)(F)); (12 U.S.C. 1749c(b)); (38 U.S.C. 1775(a)).

Subpart B—Criteria for State Agencies

Sec.
149.20 Scope.
149.21 Publication of list.
149.22 Inclusion on list.
149.23 Initial recognition; reevaluation.
149.24 Criteria.

AUTHORITY: Sec. 438(b) of the Higher Education Act of 1965, Pub. L. 89-329 as amended by Pub. L. 92-318, 86 Stat. 235, 264 (20 U.S.C. 1087-1(b)).

Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

§ 149.1 Scope.

Accreditation of institutions or programs of institutions by agencies or associations nationally recognized by the U.S. Commissioner of Education is a prerequisite to the eligibility for Federal financial assistance of institutions and of the students attending such institutions under a wide variety of federally supported programs. The recognition of such agencies is reflected in lists published by the Commissioner in the FEDERAL REGISTER. Inclusion on such list is dependent upon the Commissioner's finding that any such recognized agency or association is reliable authority as to the quality of training offered. The Commissioner's recognition is granted and the agency or association is included on the list only when it meets the criteria established by the Commissioner and set forth in § 149.6 of this part.

§ 149.2 Definitions.

"Accrediting" means the process whereby an agency or association grants public recognition to a school, institute, college, university, or specialized program of study which meets certain established qualifications and educational standards, as determined through initial and periodic evaluations. The essential purpose of the accreditation process is to provide a professional judgment as to the quality of the educational institution or program(s) offered, and to encourage continual improvement thereof;

"Adverse accrediting action" means denial of accreditation or preaccreditation status or the withdrawal of accreditation or preaccreditation status;

"Agency or association" means a corporation, association, or other legal entity or unit thereof which has the principal responsibility for carrying out the accrediting function;

"Institutional accreditation" applies to the total institution and signifies that the institution as a whole is achieving its educational objectives satisfactorily;

"Regional" means the conduct of institutional accreditation in three or more States;

"Representatives of the public" means representatives who are laymen in the sense that they are not educators in, or members of, the profession for which the students are being prepared, nor in any way are directly related to the institutions or programs being evaluated;

"States" includes the District of Columbia and territories and possessions of the United States.

(20 U.S.C. 1141(a))

§ 149.3 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the FEDERAL REGISTER of the accrediting agencies and associations which he determines to be reliable authorities as to the quality of training offered by educational institutions or programs, either in a geographical area or in a specialized field. The general scope of the recognition granted to each of the listed accrediting bodies will also be listed.

(20 U.S.C. 1141(a))

§ 149.4 Inclusion on list.

Any accrediting agency or association which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.6 should apply in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, Office of Education, Washington, D.C. 20202.

§ 149.5 Initial recognition, and renewal of recognition.

(a) For initial recognition and for renewal of recognition, the accrediting agency or association will furnish information establishing its compliance with the criteria set forth in § 149.6. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording opportunity for a hearing.

(b) In view of the criteria set forth in § 149.6, it is unlikely that more than one association or agency will qualify for recognition (1) in a defined geographical area of jurisdiction or (2) in a defined field of program specialization within secondary or postsecondary education. If two or more separate organizations in a defined field do seek recognition, they will both be expected to demonstrate need for their activities and show that they collaborate closely so that their accrediting activities do not unduly disrupt the affected institution or program.

(20 U.S.C. 1141(a))

§ 149.6 Criteria.

In requesting designation by the U.S. Commissioner of Education as a nationally recognized accrediting agency or association, an accrediting agency or association must show:

(a) *Functional aspects.* Its functional aspects will be demonstrated by:

(1) Its scope of operations:

(i) The agency or association is national or regional in its scope of operations.

(ii) The agency or association clearly defines in its charter, by-laws or accrediting standards the scope of its activities, including the geographical area and the types, and levels of institutions or programs covered.

(2) Its organization:

(i) The agency or association has the administrative personnel and procedures to carry out its operations in a timely and effective manner.

(ii) The agency or association defines its fiscal needs, manages its expenditures, and has adequate financial resources to carry out its operations, as shown by an externally audited financial statement.

(iii) The agency's or association's fees, if any, for the accreditation process do not exceed the reasonable cost of sustaining and improving the process.

(iv) The agency or association uses competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices: (A) to participate on visiting evaluation teams; (B) to engage in consultative services for the evaluation and accreditation process; and (C) to serve on policy and decision-making bodies.

(v) The agency or association includes on each visiting evaluation team at least one person who is not a member of its policy or decision-making body or its administrative staff.

(3) Its procedures:

(i) The agency or association maintains clear definitions of each level of accreditation status and has clearly written procedures for granting, denying, reaffirming, revoking, and reinstating such accredited statuses.

(ii) The agency or association, if it has developed a preaccreditation status, provides for the application of criteria and procedures that are related in an appropriate manner to those employed for accreditation.

(iii) The agency or association requires, as an integral part of its accrediting process, institutional or program self-analysis and an on-site review by a visiting team.

(A) The self-analysis shall be a qualitative assessment of the strengths and limitations of the institution or program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The agency or association provides written and consultative guidance to the institution or program and to the visiting team.

(b) *Responsibility.* Its responsibility will be demonstrated by the way in which—

(1) Its accreditation in the field in which it operates serves clearly identified needs, as follows:

(i) The agency's or association's accreditation program takes into account the rights, responsibilities, and interests of students, the general public, the academic, professional, or occupational fields involved, and institutions.

(ii) The agency's or association's purposes and objectives are clearly defined in its charter, by-laws, or accrediting standards.

(2) It is responsive to the public interest, in that:

(i) The agency or association includes representatives of the public in its policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decision-making bodies.

(ii) The agency or association publishes or otherwise makes publicly available:

(A) The standards by which institutions or programs are evaluated;

(B) The procedures utilized in arriving at decisions regarding the accreditation status of an institution or program;

(C) The current accreditation status of institutions or programs and the date of the next currently scheduled review or reconsideration of accreditation;

(D) The names and affiliations of members of its policy and decision-making bodies, and the name(s) of its principal administrative personnel;

(E) A description of the ownership, control and type of legal organization of the agency or association.

(iii) The agency or association provides advance notice of proposed or revised standards to all persons, institutions, and organizations significantly affected by its accrediting process, and provides such persons, institutions and organizations adequate opportunity to comment on such standards prior to their adoption.

(iv) The agency or association has written procedures for the review of complaints pertaining to institutional or program quality, as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner that is fair and equitable to the complainant and to the institution or program.

(3) It assures due process in its accrediting procedures, as demonstrated in part by:

(i) Affording initial evaluation of the institutions or programs only when the chief executive officer of the institution applies for accreditation of the institution or any of its programs;

(ii) Providing for adequate discussion during an on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(iii) Furnishing, as a result of an evaluation visit, a written report to the institution or program commenting on areas of strengths, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iv) Providing the chief executive officer of the institution or program with an opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the accrediting agency or association takes action on the report;

(v) Evaluating, when appropriate, the report of the visiting team in the presence of a member of the team, preferably the chairman;

(vi) Providing for the withdrawal of accreditation only for cause, after review, or when the institution or program does not permit reevaluation, after due notice;

(vii) Providing the chief executive officer of the institution with a specific statement of reasons for any adverse accrediting action, and notice of the right to appeal such action;

(viii) Establishing and implementing published rules of procedure regarding appeals which will provide for:

(A) No change in the accreditation status of the institution or program pending disposition of an appeal;

(B) Right to a hearing before the appeal body;

(C) Supplying the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics.

(4) It has demonstrated capability and willingness to foster ethical practices among the institutions or programs which it accredits, including equitable student tuition refunds and nondiscriminatory practices in admissions and employment.

(5) It maintains a program of evaluation of its educational standards designed to assess their validity and reliability.

(6) It secures sufficient qualitative information regarding the institution or program which shows an on-going program evaluation of outputs consistent with the educational goals of the institution or program.

(7) It encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program.

(8) It accredits only those institutions or programs which meet its published standards, and demonstrates that its standards, policies, and procedures are fairly applied and that its evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgment.

(9) It reevaluates at reasonable intervals institutions or programs which it has accredited.

(10) It requires that any reference to its accreditation of accredited institutions and programs clearly specifies the areas and levels for which accreditation has been received.

(c) *Reliability.* Its reliability is demonstrated by—

(1) Acceptance throughout the United States of its policies, evaluation methods, and decisions by educators, educational institutions, licensing bodies, practitioners, and employers;

(2) Regular review of its standards, policies and procedures, in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(3) Not less than two years' experience as an accrediting agency or association;

(4) Reflection in the composition of its policy and decisionmaking bodies of the community of interests directly affected by the scope of its accreditation.

(d) *Autonomous.* Its autonomy is demonstrated by evidence that—

(1) It performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational program or institution;

(2) It provides in its operating procedures against conflict of interest in the rendering of its judgments and decisions.

(20 U.S.C. 1141(a))

Subpart B—Criteria for State Agencies

§ 149.20 Scope.

(a) Pursuant to section 438(b) of the Higher Education Act of 1965 as amended by Public Law 92-318, the United States Commissioner of Education is required to publish a list of State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States for the purpose of determining eligibility for Federal student assistance programs administered by the Office of Education.

(b) Approval by a State agency included on the list will provide an alternative means of satisfying statutory standards as to the quality of public postsecondary vocational education to be undertaken by students receiving assistance under such programs.

(20 U.S.C. 1087–1(b))

§ 149.21 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the Federal Register of the State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States.

(20 U.S.C. 1087–1(b))

§ 149.22 Inclusion on list.

Any State agency which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.24 should apply in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, Office of Education, Washington, D.C. 20202.

(20 U.S.C. 1087–1(b))

§ 149.23 Initial recognition, and reevaluation.

For initial recognition and for renewal of recognition, the State agency will furnish information establishing its compliance with the criteria set forth in § 149.24. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording an opportunity for a hearing.

(20 U.S.C. 1087–1(b))

§ 149.24 Criteria for State agencies.

The following are the criteria which the Commissioner of Education will utilize in designating a State agency as a reliable authority to assess the quality of public postsecondary vocational education in its respective State.

(a) *Functional aspects.* The functional aspects of the State agency must be shown by:

(1) *Its scope of operations.* The agency:

(i) Is statewide in the scope of its operations and is legally authorized to approve public postsecondary vocational institutions or programs;

(ii) Clearly sets forth the scope of its objectives and activities, both as to kinds and levels of public postsecondary vocational institutions or programs covered, and the kinds of operations performed;

(iii) Delineates the process by which it differentiates among and approves programs of varying levels.

(2) *Its organization.* The State agency:

(i) Employs qualified personnel and uses sound procedures to carry out its operations in a timely and effective manner;

(ii) Receives adequate and timely financial support, as shown by its appropriations, to carry out its operations;

(iii) Selects competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices, (A) to participate on visiting teams, (B) to engage in consultative services for the evaluation and approval process, and (C) to serve on decision-making bodies.

(3) *Its procedures.* The State agency:

(i) Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying, and reinstating approval status;

(ii) Requires, as an integral part of the approval and reapproval process, institutional or program self-analysis and onsite reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.

(A) Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional content, methods and resources, administrative management, student services, and facilities. It prepares written reports and recommendations for use by the State agency.

(iii) Reevaluates at reasonable and regularly scheduled intervals institutions or programs which it has approved.

(b) *Responsibility and reliability.* The responsibility and reliability of the State agency will be demonstrated by:

(1) Its responsiveness to the public interest. The State agency:

(i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students, and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy, and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system;

(ii) Demonstrates that the advisory body makes a real and meaningful contribution to the approval process;

(iii) Provides advance public notice of proposed or revised standards or regulations through its regular channels of communications, supplemented, if necessary, with direct communication to inform interested members of the affected community. In addition, it provides such persons the opportunity to comment on the standards or regulations prior to their adoption;

(iv) Secures sufficient qualitative information regarding the applicant institution or program to enable the institution or program to demonstrate that it has an ongoing program of evaluation of outputs consistent with its educational goals;

(v) Encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program;

(vi) Demonstrates that it approves only those institutions or programs which meet its published standards; that its standards, policies, and procedures are fairly applied; and that its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment;

(vii) Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(viii) Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational institution or program;

(ix) Has written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable to the complainant and to the institution or program;

(x) Annually makes available to the public (A) its policies for approval, (B) reports of its operations, and (C) list of institutions or programs which it has approved;

(xi) Requires each approved school or program to report on changes instituted to determine continued compliance with standards or regulations;

(xii) Confers regularly with counterpart agencies that have similar responsibilities in other and neighboring States about methods and techniques that may be used to meet those responsibilities.

(2) Its assurances that due process is accorded to institutions or programs seeking approval. The State agency:

(i) Provides for adequate discussion during the on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(ii) Furnishes as a result of the evaluation visit, a written report to the institution or program commenting on areas of strength, areas needing improvement, and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iii) Provides the chief executive officer of the institution or program with opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the agency takes action on the report;

(iv) Provides the chief executive officer of the institution with a specific statement of reasons for any adverse action, and notice of the right to appeal such action before an appeal body designated for that purpose;

(v) Publishes rules of procedure regarding appeals;

(vi) Continues the approval status of the institution or program pending disposition of an appeal;

(vii) Furnishes the chief executive officer of the institution or program with a written decision of the appeal body, including a statement of its reasons therefor.

(c) *Capacity to foster ethical practices.* The State agency must demonstrate its capability and willingness to foster ethical practices by showing that it:

(i) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services;

(ii) Maintains appropriate review in relation to the ethical practices of each approved institution or program.

(20 U.S.C. 1087-1(b))

[FR Doc.74-19298 Filed 8-19-74;8:45 am]

APPENDIX C

Reprinted from pages 643-644 of the FEDERAL REGISTER, January 16, 1969

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office of Education

NATIONALLY RECOGNIZED ACCREDITING AGENCIES AND ASSOCIATIONS

Criteria and List

Preamble. For the purposes of determining eligibility for Federal assistance, pursuant to Public Law 82-550 and subsequent legislation, the U.S. Commissioner of Education is required to publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by educational institutions.

The Commissioner will recognize any and all agencies only for the geographic area(s) and program field(s) specifically designated in each case.

Accrediting is the voluntary process whereby an association or agency grants public recognition to a school, institute, college, university, or specialized program of study which meets certain established qualifications and educational standards as determined through initial and periodic evaluations. Accrediting also implies stimulation toward quality improvement beyond the minimum standards specified by the accrediting body.

CRITERIA

The following are the criteria which the Commissioner of Education will utilize in determining whether a nationally recognized accrediting agency or association is reliable authority as to the quality of training offered by educational institutions.

The agency or association:

1. Is regional or national in the scope of its operations. (Regional as here used means several States);

2. Serves a definite need for accreditation in the field in which it operates;

3. Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational program or institution;

4. Makes publicly available (a) current information concerning its criteria or standards for acceditation, (b) reports of its operations, (c) lists of institutions or educational programs which it has accredited;

5. Encourages and gives staff guidance for institutional or program self-study prior to accreditation;

6. Secures sufficient and pertinent data concerning the qualitative aspects of an institution or educational program, and accredits only those institutions or programs which after on-site examination are found to meet the published criteria for accreditation;

7. Has an adequate organization and effective procedures to maintain its operations on a professional basis. Among the factors to be considered in this connection are that the agency or association:

(a) Clearly sets forth the scope of its accrediting activities, both as to geographical area and nature and type of institutions or program fields covered;

(b) Has financial resources as shown by its audited financial statements necessary to maintain accrediting operations in accordance with published policies and procedures;

(c) Has clear, written definitions of and procedures for (1) the accrediting of institutions or programs, (2) placing them on a probationary status, (3) revoking accredited status, and (4) reinstating the accredited status of an institution or program;

(d) Charges only reasonable fees;

(e) Uses experienced and qualified examiners to visit institutions, to examine educational objectives, to inspect courses, programs, administrative practices, services, and facilities, and to prepare written reports and recommendations for evaluation by the agency or association—and causes such examination to be conducted under conditions that assure an impartial and objective judgment;

(f) Evaluates an institution or program only with the specific authorization of the chief executive officer of the institution;

(g) Provides for adequate consultation during the visit between the team of visitors and the faculty, administrative staff, and students;

(h) As a result of the accreditation visit, furnishes a written report to the chief executive officer of the institution with comments on the institution's areas of strength, on the areas needing improvement, and on suggested means of improvement;

(i) Provides the chief executive officer with an opportunity to comment upon the factual elements of the report of the visiting team before the agency or association takes action on it;

(j) Evaluates the report of the team in the presence of a member of the team, preferably the chairman;

(k) Provides a regular means whereby the institution may appeal to the final authority in the agency or association;

(l) Reevaluates at reasonable intervals its accredited institutions, and educational programs;

8. If an agency has developed a preaccreditation status, it shall have adequate procedures and requirements for the award of such status comparable to those employed for the award of accredited status;

9. Reviews at regular intervals the criteria by which it evaluates institutions or educational programs, in order that the criteria shall both support constructive analysis and emphasize factors of critical importance;

10. Has demonstrated not less than 2 years' experience as an accrediting agency;

11. Has gained acceptance of its criteria, methods of evaluation, and decisions, by educational institutions, practitioners, licensing bodies and employers throughout the United States;

12. Has demonstrated its capability and willingness to enforce ethical practices among the institutions, and educational programs accredited by it.

In view of the criteria set forth above, it is unlikely that more than one association or agency will qualify for recognition (a) in a defined geographical area of jurisdiction or (b) in a defined field of program specialization within postsecondary or collegiate education.

These criteria supersede the criteria previously promulgated by the Commissioner of Education on October 4, 1952, 17 F.R. 8929-8930.

LIST

The following list of nationally recognized accrediting agencies and associations includes organizations which have been determined by the Commissioner of Education to be reliable authority as to the quality of training offered by educational institutions either in a geographical area or in a specialized field. This list is published as required by the pertinent legislation and is based on information currently available.

Any other agency or association which desires to be included in the list should request inclusion in writing. Each agency or association listed will be reevaluated by the Commissioner at his discretion but at least once every 4 years.

For initial recognition and for renewal of recognition, the agency or association will be requested to furnish information establishing its compliance with the stated criteria. This information may be supplemented by personal interviews or investigation of the agency's facilities, records, personnel qualifications, and administrative procedures. No adverse decision will become final without affording opportunity for a hearing.

REGIONAL ACCREDITING ASSOCIATIONS AND AGENCIES

Middle States Association of Colleges and Secondary Schools.
New England Association of Colleges and Secondary School.
North Central Association of Colleges and Secondary Schools.
Northwest Association of Secondary and Higher Schools.
Southern Association of Colleges and Schools.
Western Association of Schools and Colleges.

NATIONAL SPECIALIZED ACCREDITING ASSOCIATIONS AND AGENCIES

Accrediting Association of Bible Colleges.
Accrediting Commission for Business Schools.
The American Association of Collegiate Schools of Business.
American Association of Nurse Anesthetists.
The American Association of Theological Schools.
American Bar Association.
American Chemical Society.
American Council on Education for Journalism.
American Council on Pharmaceutical Education.
American Dental Association.
American Library Association.
American Optometric Association.
American Osteopathic Association.
American Podiatry Association.
The American Public Health Association, Inc.
American Speech and Hearing Association.
American Veterinary Medical Association.
Council on Medical Education of the American Medical Association.
Council on Social Work Education.
Engineers' Council for Professional Development.
Liaison Committee on Medical Education.
National Architectural Accrediting Board.
National Association for Practical Nurse Education and Services, Inc.
National Association of Schools of Art.
National Association of Schools of Music.
National Association of Trade and Technical Schools.
National Council for Accreditation of Teacher Education.
National Home Study Council.
National League for Nursing, Inc.
Society of American Foresters.

OTHER

New York Board of Regents.

Dated: December 31, 1968.

PETER P. MUIRHEAD,
Acting U.S. Commissioner of Education.

[F.R. Doc. 69-553; Filed, Jan. 15, 1969; 8:47 a.m.]

APPENDIX D

CHAPTER IX

STANDARDS GOVERNING PREPARATION OF PROFESSIONAL PERSONNEL

The specific standards which relate to certification requirements are obligatory in that they are governed by statutory regulations (**The School Code of Illinois**, Section 21).

9-1 Standards governing preparation of administrators and supervisors who attained an administrative certificate (with an appropriate endorsement) available after July 1, 1966.

Position	Requirements
a. Superintendent for unit district	Administrative Certificate
High school district	Superintendent endorsement
Elementary district - four or more teachers including superintendent	Master's degree plus 30 semester hours graduate education - including 16 semester hours professional education
Note: A superintendent is the administrator directly responsible to the board of education	Two years experience as an administrator or supervisor
b. Assistant superintendent with administrative and supervisory responsibilities	Administrative Certificate (General Administrative Endorsement)
Unit district	Master's degree
High school district	20 semester hours graduate credit in administration and supervision
Elementary district	Two years experience as a teacher
c. Principal or assistant principal high school, junior high school, elementary district - 4 or more teachers including principal	Same as above
d. Supervisory - all-grade levels - General supervision, curriculum coordinator or director	Administrative Certificate (General Supervisory Endorsement)
	Master's degree
Special education - supervising more than one field	16 semester hours graduate credit of which 8 semester hours must be in curriculum and research
	Two years experience of full-time teaching
e. Supervisors in special subject areas such as art, physical education, music, language arts, foreign language, science, etc., who spend one-half time or more supervising	*Standard Special (Type 10 endorsed for supervisory)*
	Master's degree
	8 semester hours of professional education

Supervisory and Administrative Certificates available and valid for the positions cited above issued before July 1, 1968, will continue to be valid for similar positions in any school in Illinois. (See Section 9-2.)

IMPORTANT NOTE:

*Persons who obtain a special certificate after October 6, 1969, will be required to have a master's degree, 8 semester hours of professional education at the graduate level, and two years of teaching experience in order to qualify as supervisors under "d" above. This requirement is not retroactive.

9-2 Standards governing preparation of administrators and supervisors who held appropriate supervisory certificates prior to July 1, 1968.

Position	Requirements
a. Superintendent Elementary district with 4 to 10 teachers (including the superintendent)	Supervisory Certificate Bachelor's and Master's degrees recommended 16 semester hours of professional education Four years teaching experience
Elementary district with 11 or more teachers (including the superintendent)	Supervisory Certificate Master's degree 20 semester hours of graduate professional education Four years teaching experience
District with a high school	All-grade Supervisory or State Supervisory Certificate issued before 1951 Master's degree 20 semester hours of graduate professional education Four years teaching experience
Unit district	Same as above
b. Assistant superintendent with administrative and supervisory responsibilities in elementary schools	All-grade Supervisory or State Supervisory Certificate issued before 1951 Master's degree 20 semester hours of graduate professional education Four years teaching experience
With administrative and supervisory responsibilities in high school	All-grade Supervisory or State Supervisory Certificate issued before 1951 Master's degree 20 semester hours of graduate professional education Four years teaching experience

Position	Requirements
Unit district	All-grade Supervisory or State Supervisory Certificate issued before 1951 Master's degree 20 semester hours of graduate professional education Four years teaching experience
c. Principal Elementary school with 4 to 10 teachers	Supervisory Certificate Bachelor's and master's degrees recommended 16 semester hours of professional education Four years teaching experience, preferably elementary school
Elementary school general supervisor, curriculum coordinator, or director	Supervisory Certificate Bachelor's degree Professional Education: 16 semester hours with work in educational philosophy, educational psychology, elementary school supervision, elementary school curriculum, and secondary school curriculum Work in special field: 32 semester hours Four years teaching experience
High school general supervisor, curriculum coordinator, or director	All-grade Supervisory or State Supervisory Certificate issued before 1951 Master's degree 20 semester hours graduate with work in educational philosophy, educational psychology, secondary school supervision, secondary school curriculum Four years teaching experience
High school special supervisor, supervising head, or department chairman (if he spends one-half time or more supervising)	All-grade Supervisory or State Supervisory Certificate issued brfore 1951 Master's degree 20 semester hours graduate approximately divided evenly between the elementary and the secondary levels and representing preparation in the fields of educational philosophy, educational psychology, supervision, elementary school curriculum, and secondary school curriculum for professional education Four years teaching experience preferably at both elementary and secondary levels.

9-3 Standards for Media Services

9-3.1 Preparation of persons providing media service

Position	Requirements
a. The instructional media specialist: responsible for both library and audiovisual services	Teacher Certificate Work in special field: 27 semester hours with at least 12 in audiovisual and 15 in library science, including *professional preparation (at four year college and/or graduate levels) in administration, organization (cataloging and classification), reference, selection, materials for elementary and/or secondary levels, production and communications.*
School librarian responsible for library services	*Teacher Certificate* *Work in special field: 18 semester hours in library science including professional preparation (at four year college and/or graduate levels) in administration, organization (cataloging and classification), reference, selection, and materials for elementary and/or secondary levels.*
Audiovisual coordinator: responsible for audiovisual services	Teacher Certificate Work in special field: 18 semester hours in audiovisual education including *professional preparation (at four year college and/or graduate levels) in utilization, production, administration, learning theory, and communication.*
Media (instructional materials) specialist: works with students, teachers, and media (Instructional Materials school library, and audiovisual personnel)	Teacher or Standard Special Certificate with media (instructional materials) Teaching endorsement Work in special field: 32 semester hours in media (instructional materials, library science, audiovisual) including *professional preparation (at a four year college and/or graduate levels) in administration, organization (cataloging and classification), reference, selection, materials for elementary and/or secondary levels, production and communications.*
School library specialist: works with students, teachers, and school library services	Teacher or Standard Special Certificate with School Librarian Teaching Endorsement Work in special field: 32 semester hours in library science, *including professional preparation (at four year college and/or graduate levels) in administration, organization (cataloging and classification), reference, selection, materials for elementary and/or secondary levels.*

Position	Requirements
Audiovisual specialist: works with students, teachers, and audiovisual services	*Teacher or Standard Special with Audiovisual Specialist Teaching Endorsement Certificate* Work in special field: 32 semester hours in audiovisual education including *professional preparation (at four year college and/or graduate levels) in utilization, production, administration, learning theory, and communications*
Media (instructional materials) supervisor or director: works with teachers and supervises other media (instructional materials, school library, audiovisual), specialists one-half time or more	Supervisory or Standard Special with media (instructional materials) Supervisory Endorsement, or the General Supervisory Endorsement (Administrative Certificate) with a specialization in media recommended
	Work in special field: 32 semester hours in media (instructional materials, library science, audiovisual) *including professional preparation (at the four year college and/or graduate levels in administration, organization, (cataloging and classification), reference, selection, materials for elementary and/or secondary levels, production and communications.*

9-4 Standards for Pupil Personnel Services

9-4.1 All personnel, school psychologists, school social workers and school guidance counselors shall hold a type 10 or type 73 certificate with the appropriate endorsement.

9-4.2 According to Section 10-22.23 of the School Code *all school nurses must be registered. Any resident nurse may be employed by a school board.*

9-4.3 All school nurses wishing to be considered official representatives of a Pupil Personnel Service team should hold a type 73 certificate with appropriate endorsement or have a letter of approval on file with the Office of the Superintendent of Public Instruction.

9-5 Standards for Secondary Teachers

The quality of instruction depends upon many factors; however, a teacher should have substantial college or university training in the field directly related to the subject matter that is being taught.

Although certain basic requisites concerning specifics of credits for certification are an integral part of minimum standards, other factors are important. Evaluation of staff and programs cannot be based exclusively on statistical or quantitative measures. The results of the school program must be considered as part of the evaluation which depends to a great extent upon the professional judgment of the evaluators.

Special resource personnel with demonstrated competence in their field may be utilized in instruction for purposes of enrichment. The rationale for their utilization and renumeration must be explained and justified clearly by school officials.

Recommendations for educational requirements for subjects taught on the secondary level may be found on the following pages.

a. AGRICULTURE

24 semester hours in the field, including work in some of the following areas, plus preparation in the specific courses taught:

1. Agriculture science
2. Agriculture engineering
3. Agriculture fundamentals
4. Agriculture electricity and construction
5. Horticulture
6. Agriculture power and machinery
7. Agriculture supply service
8. Agriculture occupations

If special courses are taught in this field, 8 semester hours are required for each course taught.

b. ART

24 semester hours in the field, including an appropriate distribution in:

1. Painting, drawing, printmaking
2. Sketching, lettering, jewelry, design, silkscreen
3. Pottery and sculpture
4. Constructional design
5. Art education
6. History and appreciation of art

c. AVIATION/AEROSPACE EDUCATION

1. General Aviation and/or Aerospace Education
   Completion of an approved aerospace education workshop course. Five hours of flight orientation or familiarization within the last five years. This flight experience does not necessarily need to be as a member of a flight crew.

   If the material that is being taught is strictly sociological in nature, the flight orientation requirement may be minimal. If the material that is being taught emphasizes astroscience, the teacher should have at least one college course in astronomy.

2. Aviation Science Course
   (Based upon a preflight course leading to completion of the FAA private pilot's written examination).

   A valid FAA private pilot's license or higher, or a valid FAA ground school instructor's certificate and ten hours of flight orientation or familiarization in the general aviation category aircraft within the last five years. This flight experience does not necessarily need to be as a member of a flight crew.

d. BUSINESS EDUCATION

24 semester hours, which must include a specialized methods course with the following minimum qualifications for the subject matter areas of course taught:

1. Typing	6 semester hours, or a statement of equivalency from the institution granting the degree, or the completion of the terminal course in the typewriting sequence.

2.	Shorthand and Transcription	6 semester hours, or a statement of equivalency from the institution granting the degree, or the completion of the terminal course in the shorthand-transcription sequence.
3.	Bookkeeping, accounting, recordkeeping	6 semester hours in accounting and a course in data processing, or a statement of equivalency from the institution granting the degree.
4.	Business law	5 semester hours of business law.
5.	Distributive subjects: i.e., marketing, retailing, distributive education	8 semester hours covering at least 2 of the following: sales, retailing, advertising, principles of marketing.
6.	Business arithmetic	2 semester hours in business mathematics or 6 semester hours in accounting.
7.	Office practice, secretarial practice, clerical practice, or office machines	2 semester hours in course work which includes the operation of the office machines taught in the secondary school course and qualifications for teaching whichever of the following is part of the course: typewriting, shorthand, bookkeeping (see paragraphs 1, 2, and 3 as aforementioned).
8.	Basic business, general business, introduction to business, consumer education, or consumer economics	3 semester hours of consumer education and at least 7 semester hours distributed in at least 3 of the following areas: business law, economics, introduction to business, marketing, management, or a methods of teaching basic business.
9.	Business English	2 semester hours in Business English, business correspondence, business communications, or business writing.
10.	Business economics	8 semester hours in the area of economics, finance, financial management, or marketing, including at least one course in principles of economics.
11.	Data processing	5 semester hours in data processing or the equivalent.

e. ENGLISH

24 semester hours in the field including 6 semester hours in rhetoric and composition and not more than 8 semester hours in speech and journalism. To teach grammar, American literature, English literature, world literature, reading or dramatics, the English teacher must have one course in the subject.

f. JOURNALISM

8 semester hours in journalism and 16 semester hours in English, or 18 semester hours in journalism and 6 semester hours in rhetoric and composition. (This is a typographical correction. It does not change standards.)

g. SPEECH

8 semester hours in speech and 16 semester hours in English or 18 semester hours in speech and 6 semester hours in rhetoric and composition.

h. FOREIGN LANGUAGE

20 semester hours in the language

Note: No credit may be allowed for high school language, unless such credit is approved by an institution of higher learning, and it is noted on the official transcript; in which case one semester hour may be allowed for each unit of high school language, not to exceed four semester hours.

i. HEALTH EDUCATION

20 semester hours in the field

Required Health Education Component

One course from each of the following areas to total 10-14 semester hours:

1. Advanced Concepts of Health
2. Programs in School Health
3. Programs in Community Health
4. Curriculum Development and Evaluation in Health Education

Additional Health Education Component

One course from at least three of the following areas to total 6-10 semester hours:

1. The Growing and Developing Organism
2. Ecological Relationships
3. Disease Control
4. Human Sexuality and Family Life
5. Food Practices and Eating Patterns
6. Consumer Health Sources and Resources
7. Safety
8. Mood-Modifying Substances
9. Personal Health Practices
10. Mental/Emotional Health

j. HOMEMAKING EDUCATION

24 semester hours in the field, including work in some of the following areas, plus preparation in the specific teaching area.

1. Human Development (includes prenatal, child, adolescent, and adult development and care.)
2. Interpersonal and Family Relationships
3. Consumer Education and Home Management
4. Nutrition and Food
5. Housing, Home Furnishing and Equipment
6. Clothing and Textiles

To teach a special course in any one of the above areas, eight semester hours are required in the area to be taught.

To teach in an occupational program, the teacher should have study in Home Economics related occupations, preparation for cooperative vocational educational programs, and have work experience in a Home Economics related occupation.

k. INDUSTRIAL ARTS

24 semester hours in the field, including work in each shop subject to be taught. To teach a unit shop, the teacher shall have 8 semester hours in the subject taught.

l. INSTRUCTIONAL MATERIALS (Media Services)

All staff members assigned media duties, including librarians, shall satisfy requirements in Chapter 9-3.

m. MATHEMATICS

20 semester hours in the field

Note: No credit may be allowed for high school mathematics, unless such credit is approved by an institution of higher learning, and it is noted on the official transcript; in which case, one semester hour may be allowed for each unit of high school mathematics not to exceed four semester hours. Teachers assigned to teach a data processing course will need to meet the data processing requirement as set forth in business education.

n. MUSIC

24 semester hours in the field, including

1. Applied music
2. Music theory
3. Conducting
4. History of music
5. Methods and materials for general school music

o. PHILOSOPHY

20 semester hours in the field

p. PHYSICAL EDUCATION

20 semester hours in the field, including

1. Team sports
2. Individual activities
3. Rhythms
4. Body mechanics and basic exercises
5. Organization and administration of physical education classes

q. PSYCHOLOGY

20 semester hours in the field

r. SAFETY AND DRIVER EDUCATION

16 semester hours in the field, including preparation as follows:

1. 3 semester hours in general safety
2. 5 semester hours in driver education and advanced traffic safety
3. 8 semester hours chosen from two or more of the following areas:

   General safety, including traffic and industrial safety
   Advanced psychology and sociology
   First aid and health education
   Instructional materials

4. *Teachers assigned to either simulation or multiple car programs must have preparation in the use of these methods which shall consist of a minimum of one semester hour or its equivalent in each area.*

s. *SCIENCE, biological*

24 semester hours in the field, including the semester hours indicated in the subject to be taught

1.	Biology	8 semester hours in botany including 5 semester hours in laboratory work, 8 semester hours in zoology including 5 semester hours in laboratory work NOTE: ten semester hours laboratory work in biology satisfy the laboratory requirement.
2.	Botany	8 semester hours in botany including 5 semester hours in laboratory work.
3.	Physiology	8 semester hours
4.	Zoology	8 semester hours in zoology including 5 semester hours in laboratory work.

t. SCIENCE, physical

24 semester hours in the field, including the semester hours indicated in the subject to be taught.

1.	Astronomy	5 semester hours
2.	Chemistry	10 semester hours
3.	Geology	8 semester hours
4.	Physics	10 semester hours
5.	Physiography	5 semester hours
6.	Aerospace	5 semester hours
7.	Earth science	8 semester hours

Note: It is recommended that a teacher of astronomy, chemistry, or physics has the minimum preparation required of a mathematics teacher.

u. SCIENCE, General

24 semester hours in the field including:

1.	Physical science	8 semester hours
2.	Biological science	8 semester hours

v. SOCIAL STUDIES

24 semester hours in the field, including the semester hours indicated in each subject to be taught:

1.	United States History	8 semester hours
2.	Civics-political science	8 semester hours
3.	Economics	8 semester hours
4.	Geography	8 semester hours
5.	Sociology	8 semester hours
6.	World history	8 semester hours in world history, 5 semester hours in U.S. History
7.	Anthropology	5 semester hours

Note: Every history teacher shall have 16 semester hours in history.

w. SUBSTITUTE TEACHER

A person substituting for any member of the professional staff should have the qualifications required of the staff member for whom he is substituting.

To serve as a substitute teacher, a person shall hold a valid certificate, which may be a substitute teacher certificate.

A teacher holding a substitute teacher certificate may teach only in place of a certified teacher under contract, for a period not to exceed 90 paid school days or 450 paid hours in any one school district in any one school term. Where such teaching is partly on a daily and partly on an hourly basis, a school day shall be considered as five hours.

x. JUNIOR HIGH or Departmentalized Upper Elementary Grades

18 semester hours in each field, including at least five semestor hours in each course where subject matter areas are divided into two or more specific courses. This requirement applies to teachers of the 6th, 7th, and/or 8th grade where the organizational pattern is a junior high or the instructional pattern is in part or entirely departmentalized. When departmentalized in part, the requirement only applies to the departmentalized teachers.
This regulation will not apply to teachers who were employed in such a position prior to September 1, 1973. Teachers not meeting the requirement and being assigned to a departmentalized teaching situation for the first time September 1, 1973, shall have five years to gain the necessary 18 semester hours. By September 1, 1978, all other teachers assigned departmentalized responsibility shall meet the 18-semester-hour requirement. This requirement applies to that portion of a teacher's assignment that constitutes the majority of the assignment.

CHAPTER 5

ACCREDITATION, CERTIFICATION, AND THE ECONOMICS OF INFORMATION

Henry M. Levin

The author asserts that accreditation and certification are basically information validating functions. A conceptual framework from which alternative information gathering and disseminating procedures can be judged against relative costs is presented. Drawing upon theory associated with the economics of information, the author applies a "cost/utility" analysis approach in order to compare information gathering and analyzing methods. In the cost/utility analysis approach, the utility of information is judged against its value for the receiver, e.g., student, employer, state, training institution, accrediting agency, public, etc. The value of information, in turn, must be analyzed against the cost necessary to obtain it. Such costs are incurred in the collection, analysis, and dissemination to relevant audiences.

The author lists six types of information that are viewed as necessary for accreditation, program approval, and certification decisions. These are: 1) desired outcomes or teaching behaviors, 2) the utility or social values of each outcome/behavior, 3) specification of measurable teacher characteristics associated with each outcome/behavior, 4) the probability that the particular characteristic will produce the desired outcome/benefit, 5) specification of alternative methods for assessing characteristics, 6) the probability that a particular method will assure the presence of the characteristic, and 7) the cost of each alternative method.

The author presents a formula that can be used to compare the utility of alternatives when costs are included in the analysis. He carefully points out that there is considerable debate over the importance of different characteristics and the value attached to each benefit/outcome.

The author concludes his paper by indicating the benefits of a cost utility framework. It allows decision makers to evaluate both the "social value or utility of a particular certification approach* as well as their costs." This framework acts as a model for continued exploration of alternative processes and review of present practice. It forces the policy maker to systematically analyze the social values or utility of specific outcomes and to compare the probability that given characteristics (of an individual or program) will produce the outcome. All of this is analyzed with costs or resource use necessary to gain and interpret information. Where outcomes are difficult to obtain by empirical validation (e.g., teaching behaviors associated with student learning, the author suggests that social values can be ascertained through the use of opinion surveys (for educational outcomes) and by expert judgment (for identifying characteristics with a high probability of producing the outcomes).

---

*Although the author applies cost/utility analysis in a holistic manner,

---

(Footnote continued)
information validating functions can be separated into three areas: 1) accreditation, 2) certification through program approval, and 3) local employment decisions. Dr. Levin's paper provides a conceptual tool that can be applied for any of the three functional areas. He points out that the identification of desired outcomes are basically value choices; therefore, there may be different social values or utilities attached to outcomes for the different areas. The focused cost/utility approach can be applied with different components in the Levin formula for each function.

Accreditation, Certification, and the Economics of Information

Henry M. Levin *

Introduction

The seventies seem to be characterized as a time in which many traditional aspects of our educational system and its preparation of professionals are being challenged (R. Smith 1975). To a large degree it is argued that the programs that are accredited for providing professional training have little demonstrated relationship with the proficiencies that they are supposed to develop. Moreover, the certification or licensing of professionals, whether based upon examinations or the receipt of training in accredited programs, is also being questioned as a procedure for assuring that professionals are qualified in their fields.

Nowhere is this phenomenon more evident than in the recent ferment on the accreditation of teacher-training programs and certification procedures for teachers. In virtually all states, teachers have been required traditionally only to complete a list of courses that meet the state requirements within an accredited program in order to be certificated (Koerner, 1963; Conant, 1963). Not only is there no direct measure of how successful the programs are in providing well-trained teachers, but there is a large amount of inferential evidence that suggests that the outcomes are erratic and quality-control is non-existent. For example, few if any teacher-training candidates are eliminated from such programs for lack of proficiencies, even though it is highly unlikely that all candidates in all

---

* Professor of Education and Economics, Stanford University, Stanford, California

programs would meet reasonable professional standards in a function as demanding as teaching. This anomaly is exacerbated by the fact that teacher-training programs have traditionally enrolled persons with the lowest academic proficiencies of any major area of study as reflected by measures of high school preparation as well as test scores (Educational Testing Service 1955; Wolfe 1965:286-96; E. Haven 1967; J. Coleman 1966: Chap. 4). It is also mirrored in the widespread dissatisfaction with the apparently wide variance in teaching effectiveness among individual teachers and the public demands for accountability.

In response, states like California and Illinois have been exploring alternative methods of setting out new standards for the training of teachers or measuring teacher performance in order to improve the quality of persons entering the classrooms. But, such a search for new alternatives is beset with a variety of problems. In this paper I will attempt to consider some of these issues by looking at accreditation of programs and certification of individuals for professional roles in the context of an exercise in the economics of information. By setting out a conceptual framework for reviewing these questions, I believe that the alternatives and their consequences might be made clearer. While I will refer specifically to the accreditation of teacher-training programs and the certification of teachers, the analysis will be general enough that it could be applied to the health professions, architects, lawyers, and a wide variety of other professionals.

Before discussing the development of a conceptual framework for evaluating the accreditation of teacher-training programs and certification of teachers, it is useful to ask the more basic question of why we are concerned with this exercise in the first place. Often we take for granted the need for an activity which has persisted as long as this one. Certainly, this is true with respect to the certification of teachers where the criteria that we use to certify are questioned while the basic function of certification is not. Surely we can consider a world where we would not expend resources in this direction. For example, what if all of the benefits of education were conferred upon individuals and their families and students could choose schools or even individual teachers who met their particular needs? Finally, let us assume that teachers would not receive tenure protection of life-long contracts, but rather the typical arrangement entailed a one to five year contract. Such a system would be similar to the general conditions set out for an education voucher approach where families would be given tuition vouchers by the state that would be redeemed at any "approved" school, and such schools would compete for students by attempting to attract and retain them (Friedman 1962).

In such a case, is it not clear that we would want to worry about teacher certification or accreditation of those training programs that are preparing teachers. Individual students and their parents would simply decide for themselves if they liked the schooling that was being provided, and they would select their schools and individual teachers according to their own criteria. Schools that were unsuccessful in attracting or retaining students because of poor teaching as perceived by actual or potential clientele would have an incentive to dismiss those teachers and hire other ones. In the long run, the best teachers in society would be retained by the schools, and the poorer ones would have difficulty in obtaining employment. The determination of who was good and who was bad would be actualized through the market-choice mechanism where the clientele themselves--parents and students--would make such decisions.

There is, then, a set of hypothetical conditions where we would not have the need to construct a system for certifying teachers or accrediting teacher-training programs.

But, there are at least three reasons that the problem is not so easily soluble. First, a basic rationale for public support of schooling is that there are benefits conferred on the entire citizenry by a system of schools that addresses certain uniform social goals such as a common set of values and knowledge for the functioning of a democratic society. While the precise content of this common set is contestable, the fact that we expect schools to do more than satisfy only the private whims and desires of each student and family is not. Accordingly, we must have some way of assuring that the schools are meeting these social goals as well as satisfying individual needs. Second, it is not clear that students and their parents are able to evaluate the quality of teaching in an appropriate way. For example, the teacher who entertains his students while teaching them little of value may be preferred by students to one who provides less entertainment but more substance. Even if test results indicate that the child is not learning very much, it is difficult to isolate the quality of teaching from many other factors in establishing the causes of failure (Averch et al., 1974). This is not to say that we shouldn't put somewhat more reliance on student and parent opinion than we presently do, for I believe that something is to be gained from increasing the voice of these groups in teacher selection and retention

(Levin 1970). But, the replacement of the present system by one of student and parent opinion is obviated by the fact that the perceived signals of good teaching that are received by these constituencies may be misleading.

Finally, the establishment of teacher tenure after a short period of employment--usually three years--precludes the flexibility in hiring and dismissing teachers according to the feedback received from students and parents. While the arguments for protection from dismissal after a probationary period are rather complex, the institution of teacher tenure does, in fact, exist. Given the political power of the educational professionals, this institution is likely to continue to persist. Moreover, there are some compelling arguments in support of tenure, particularly the need to protect teachers from arbitrary dismissals of a political nature. The fact that political values change from time to time and across different populations can jeopardize arbitrarily the career of a teacher who represents an unpopular viewpoint in a hostile climate.

Thus, the facts that we expect the schools to provide benefits to society that go beyond the sum of those conferred upon individual students (Weisbrod 1964), that it is difficult for many students and their parents to judge certain aspects of teacher proficiency, and that teachers can not be instantaneously dismissed mean that somehow the state must be concerned about the quality of teaching. It can not be left only to the individual judgments of students and their parents or the educational administrators who are vested with managing the schools in behalf of society. The purpose of certification of teachers and accreditation of the programs in which they received their training is to provide information on whether teachers possess the minimum proficiencies that are required from the teaching function. Since this is an exercise in the provision of information, it is important to review the criteria for setting out how one selects the information that is necessary to make a certification or accreditation decision.

Accreditation and Certification and the Economics of Information

How can the conceptual framework represented by the economics of information contribute to the construction of a certification or accreditation policy? The economics of information is based upon the assumption that the provision of information has both a benefit and a cost (Stigler 1961). The benefit that is attributable to information derives from its value in improving decision-making and its resultant outcomes. For example, the consumer who finds from an advertisement that he can purchase an item that he needs at a reduced price will receive a benefit from that information that is equal to the price reduction. The cost of information refers to the resources required to collect, analyze, and disseminate it as well as the cost to the user of acting on it. Such costs include not only the pecuniary ones that we might find on accounting statements, but also such "non-accounting" costs as the information-user's time in obtaining the information. The design of an information system would be based upon the objective of maximizing the benefits of the system relative to its cost. Moreover, it would only be undertaken if its benefits exceeded its costs. A simple consumer example is instructive. Assume that a person is seeking a new car, and he visits his local automobile agency to ascertain prices. He selects a particular model that will satisfy his needs, but he decides to think about it before buying. Outside of the automobile agency, he purchases a newspaper and turns to the auto section. There he finds that he can obtain the same model for $200 less, but the agency is ten miles away. He returns to the automobile agency and shows them the advertisement, and they agree to reduce the price by $200 to make the sale. For the relatively nominal cost of the newspaper and the value of the man's time, he was able to receive a benefit of $200.

Clearly, the overall pattern of this simple example is reflected in the concept of teacher certification and accreditation of teacher training programs. That is, it is tacitly assumed that by providing the information that is implicit in certification or accreditation standards and requiring that it be satisfied by prospective teachers and/or training programs, the benefits to society of maintaining high teacher standards will exceed the costs of the information requirements and in a somewhat related vein the costs of the educational or selection process for meeting these standards will be less than the social benefits that accrue from such requirements. But the abstraction of the teacher certification or program accreditation example is hardly as compelling as the example of price information for the car buyer. For one thing we do not know the benefits of any particular requirement nor are there easy ways to calculate them. In part, this is because the benefits are often incommensurable and can not be easily quantified. Moreover, there are many different constituencies who might have an interest in teacher proficiencies, and each of these may be concerned with very different types of benefits. Finally, the ability to tie any particular benefit to a social constituency and any particular certification requirement for teachers or program requirement for institutions to social benefits is severely limited.

Let us take a rather common attribute that we expect of the schools and ask how it can be related to social benefits, that of reading proficiencies. It is possible to ask the question, how much is it worth to society to know that the average teacher possesses at least minimal proficiencies for the teaching of reading. The first consideration is whether the absence of that information would make any difference in whether teachers have this proficiency. That is, at least one possibility is that persons who select teaching as a profession and prepare for that eventuality possess the minimal skills that are required to teach reading, and a random selection of that pool of trained persons would yield as good a group of reading teachers as any that we could select through the typical certification or program accreditation approach. In this case, there would be no social benefits accruing to the use of resources for requiring the latter information.

In contrast, let us assume that the use of certification and program accreditation standards does indeed improve the selection of teachers with respect to their skills at teaching reading. What is this benefit worth? Conceptually, the benefit would be equal to the overall improvement in reading weighted by the social value placed on improved reading. But, how can we put a value on increased reading proficiencies? While some persons might attempt to determine such a value by looking at the specific relation between labor market earnings and reading test scores while holding other factors constant, it is difficult to argue that reading levels should be evaluated only in terms of their labor market values. Such a practice would ignore the cultural value of improved reading as well as its value to persons outside of the labor market such as housewives, children, and retired persons.

But if such basic educational and teaching outcomes as reading are difficult to evaluate with respect to their benefits, how can we hope to evaluate the contribution of certification and accreditation to improved teaching performance in such areas as citizenship, social values, work behavior and so on. Each of these latter aspects of teaching is difficult to define in itself, and even if they were defined adequately they would be difficult to associate with benefits that might be measured in the monetary units used to measure costs.

Not only are we beset with a variety of obstacles when we attempt to assess the social benefits of particular improvements in teacher proficiencies that might be engendered by certification and accreditation standards, but the problem is more complicated when we consider the large number of different audiences who have different educational demands. For example, some parents would place a high value on teachers having a highly structured approach to the teaching function, while others would place a negative value on such proficiencies. Some parents believe that good citizenship is inculcated by ingraining an unquestioning respect for the flag, the government, and the political institutions and history of the nation, while others believe that it is just as important or more important to build in a capacity for self-criticism that would emphasize the maltreatment of the Indians, the deleterious roles of large corporations, environmental issues, corruption in government, unjust wars, and slavery along with information on the prouder accomplishments of the nation.

Moreover, different constituencies have different wishes. Employers wish the schools to produce good and loyal workers who are highly trainable and are able to control their emotions, while patrons of the arts desire students who can capitalize on their emotions in a highly creative and imaginative form. There are some implicit conflicts between these two sets of goals if the social conditioning that is required for producing good workers is not consonant with that which is required for producing good artists. Some groups argue for uniformity in language skills and cultural formation, while others believe in a pluralistic, multi-cultural, and multi-lingual approach that emphasizes the contributions and importance of a wide variety of cultures to the formation and functioning of the society. The point is that there is hardly a common set of goals and objectives that can be used to assess credentialing and accreditation standards in carrying out a benefit-cost calculation.

Finally, even if we could associate particular benefits with the attainment of an educational result and we could agree on the desirable mix of educational objectives, it is necessary to know what aspects of certification or accreditation will improve the productivity of teachers who meet the licensing standard or of training programs that meet the accreditation standard. Our state of knowledge on any systematic relationship between program requirements and teaching proficiencies or measurable personality characteristics of teachers and their effectiveness is so deficient that there is no set of standards for either certification or accreditation that can be justified on research grounds (Averch et al., 1974). This does not mean that there is not a large body of research and conclusions on these subjects, but rather it means that such evidence is often contradictory or limited only to a few very narrow criteria that are not generalizable to something as generic as teaching proficiency (Heath and Nielson 1974). Moreover, the complexities of the teaching situation with its subtle interplay of individual and social interactions and variety of subjects, activities, and settings is likely to prevent our success in uncovering findings that can be used to prescribe in precise terms both programs and certification standards.

If we are not able to measure benefits of different certification or accreditation requirements or to agree on what goals accreditation or certification should emphasize or to ascertain which particular teacher or program characteristics are associated with those results that we can agree are desirable, how should we use an economics of information or any conceptual approach to setting out accreditation or certification information? The answer is that such a conceptual framework might be used in a formal way, but it can definitely contribute in a heuristic way by forcing us to ask the question of whether any particular requirement is likely to yield benefits that exceed the costs of providing and meeting the standard that is set out. That is, we are forced to evaluate the probable consequences of any particular requirement rather than being permitted to construct a certification or accreditation approach that does not consider the benefits and costs associated with it.

This does not mean that there is only one possible approach and that an economics of information type of assessment will reveal it. For when there is a great deal of conflict over desirable objectives, when there is difficulty in ascertaining how one might measure the attainment of objectives, and when it is not possible to relate particular teacher or program characteristics to objectives, there must necessarily be no single ascertainable solution but rather a variety of them. However, this does not mean that all solutions are equally acceptable. Some will be better than others in conferring a higher level of probable benefits relative to their costs, and these are the ones that evaluation might pursue. Thus, in this framework the economics of information represents a way of thinking about the problem in seeking a solution rather than a mechanistic set of calculations for obtaining a single optimal result.

Alternative Approaches and Cost-Utility Criteria

The particular problems in constructing formal estimates of costs and benefits for different credential or accreditation standards suggest that a cost-utility approach be adopted. A cost-utility approach considers the costs and perceived benefits of the various alternatives. Costs are estimated by considering the various resource requirements for obtaining the information and for the resources demanded by individual teachers and programs for meeting the requirements. Utility refers to the value of the outcomes, an estimate based partly upon intuitive evaluations. That is, any particular alternative can be rated on a number of dimensions according to perceived benefits as estimated by the decision-maker or ratings of the relevant audiences. For example, parents, teachers, administrators, businessmen, and others could be surveyed to see how they rate particular outcomes, and educational researchers, teachers, and administrators could rate the possibilities that particular training, knowledge, or personality requirements would meet those objectives. From these ratings it would be possible to construct expected utility scales that enable one to compare the estimated values of different alternatives.

Cost data can be obtained by first matching each alternative against the resources requirements necessary to meet it. For example, if an accreditation requirement is posited as a particular set of courses and internship, it is possible to determine what the cost is of that set of experiences for a typical trainee. There are also costs for monitoring the program by public authorities to be certain that they are meeting the requirements, and there are costs to the institution associated with site visits and periodic reports to the accrediting authorities. In addition, the time of the trainee must be taken into account, since some accreditation or certification requirements will necessitate a greater expenditure of time on the part of the teacher-trainee than will other standards. Since the procedures for ascertaining costs are described in some detail elsewhere, it is not necessary to report costing methods in greater detail here (Levin 1975).

Rather, the application of cost-utility analysis can best be demonstrated by considering the alternatives for certification or program accreditation. In general, there are three types of requirements that can be considered for assessing teacher competencies: (1) educational and training characteristics, (2) knowledge and personality attributes that can be ascertained through a testing program and (3) behaviors that can be ascertained through direct observation of trainees or probationary teachers. Educational and training characteristics represent relevant aspects of the teacher's formal educational and training preparation. Typically, they are the only factors that are considered in the accreditation of teacher-training programs by voluntary associations such as NCATE or by state credentialing authorities. Normally, prospective teachers are required to take an approved list of courses at an institution that has an appropriately-trained faculty, an adequate library, and a joint arrangement for providing approved in-service experience or "practice teaching" with a local educational agency. Moreover, specific credentials are given on the basis of having taken specialized training in the appropriate areas.

Of course, the education and training characteristics approach to accreditation and certification need not be limited to present forms. A much greater qualitative monitoring of programs and courses could be adopted to improve the quality-control aspect of this route. In fact, one change that might be made in existing requirements is that a written and detailed record would be prepared for each trainee on both his or her strengths and weakness in fulfilling each requirement. This record could be utilized by prospective employers to examine the pattern of attainments of each potential teacher, and it is likely that it would provide much more information than the typical list of grades and the relatively cursory hiring interview. Moreover, it would likely stimulate those instructors who would be required to both train and rate teacher-trainees to be much more thoughtful in considering strengths and weaknesses of each trainee as well as providing a more constructive feedback on performance to each trainee than does the traditional grading system.

Knowledge and personality attributes that are thought to affect teaching prowess are the second type of requirement that might be considered for certification although they are less relevant to program accreditation. Such traits include the cognitive knowledge of subject matter and such pedagogical principles as the construction of curriculum, appropriate use of materials, ability to diagnose learning needs, proficiency at evaluating student progress, and so on. Personality attributes include such factors as flexibility, inter-personal traits, tolerance of cultural differences, and other factors that might be important for good teaching.

It is believed that at least the cognitive characteristics might be measured through written and oral examinations. For example, knowledge of subject matter can be tested in a traditional manner as can certain aspects of professional knowledge. The National Teachers' Examination of the Educational Testing Service represents one device for assessing both intellectual aspects and professional knowledge of the prospective teacher, and school districts such as New York City have required that all secondary teachers pass a specific subject matter examination to be eligible for licensing in any particular subject. Other written examinations can be constructed that will be tailored towards the other specific requirements that are believed to be important for good teaching.

In addition, it is possible to set out procedures for oral examination of prospective teachers with respect to their knowledge, creativity, and personality factors in order to assess their appropriateness for teaching. The extent to which both oral and written examinations can evaluate the factors that are important to teaching is problematic in that it depends not only on the identification of what is important but also on the ability of examinations to measure those dimensions that are considered to be important. This is a matter that we will return to later, and it also pervades the third of the alternatives, assessment of teaching behavior through the direct observation of trainees or probationary teachers in the classroom.

In recent years this approach has become formalized under the title of Competency-Based Teacher Education (CBTE) or Performance-Based Teacher

Education (PBTE), and it is being widely recommended as an answer to the problem of certifying teachers as well as of assuring teacher accountability (Smith 1975, Rosenshine and Furst 1973; Heath and Nielson 1974). Essentially, the logic of this approach is constructed as follows. From research on teaching effectiveness it is possible to generalize about the characteristics that are required for good teaching. Accordingly, particular performance-based criteria can be set out for each dimension that is shown to be associated with teaching effectiveness. Teachers and teacher trainees will be observed and rated according to whether they meet the minimal criteria along each of these dimensions. For example, if personal warmth is thought to be an important requisite for teaching primary age children, teacher-trainees and probationary teachers might be evaluated through direct observation of their teaching in order to see how well they demonstrate warmth in their classroom relations. Other dimensions from enthusiasm to subject knowledge to creativity to cultural sensitivity would also be assessed through ratings of classroom performance of trainees.

While we have set out three sets of standards because they are analytically different, they can also be combined into a single accreditation or certification approach. For example, all prospective teachers might be required to complete an accredited training program which would entail specific educational experiences of a particular quality as reflected in the facilities and faculty of the training institution. Successful completers of such programs would then undertake examinations with respect to subject and professional knowledge as a first phase of the certification procedure, and subsequently they would be rated according to the various dimensions of their classroom performance before receiving a license or teaching credential.

But, how might we subject these approaches or any combination of them to a cost-utility analysis? Before attempting to answer that question, we must recall two difficulties that we discussed above. First, the criteria that we will desire for our teachers will obviously depend on educational goals, and these are likely to be subject to great controversy among different constituencies. Second, there is a great deal of uncertainty as to what types of personality characteristics, knowledge, and classroom behavior are necessary for producing any particular educational outcome. This means that evaluation of any particular approach will be fraught with assumptions about what are appropriate educational outcomes as well as what are the teacher characteristic that produces these outcomes. To a very great degree these assumptions will be based upon viewpoints or committments that are derived primarily from opinions and value judgments rather than from systematic research. In fact, the difficulties of uncovering generalizable factors which can be linked to teaching performance and effectiveness is evident throughout the literature (Travers 1973).

Given this uncertainty and the lack of an appropriate knowledge base, the subjective nature of much of what follows is obvious. Yet, a number of stages are proposed for setting out a policy for accreditation or certification. These include (1) the specification of educational outcomes or desirable teacher behaviors; (2) the setting of a value or social utility for each of these outcomes or behaviors; (3) the specification of teacher characteristics that are associated with each of these outcomes or teacher behaviors; (4) the specification of alternative methods for assuring the existence of those characteristics as well as the probability of each method in successfully identifying the attainment of the characteristic and the cost of each alternative; and (5) the cost-utility comparison.

(1) Specification of Educational Outcomes or Desirable Teacher Behaviors

Ultimately, we cannot escape the direct confrontation with values in that we must begin by specifying what we believe to be important educational outcomes or important dimensions of teacher behavior that we believe will lead to desirable educational results. The difficulty in doing this is of course vested in the fact that different constituencies such as different groups of parents, businessmen, taxpayers, and students with a legitimate interest in education may have considerably different views on what are desirable outcomes or teacher behaviors.

(2) Setting a Value or Social Utility for Each Outcome or Behavior

Once the important, desirable, or possible educational outcomes were specified, we would need to ascertain their social value. That is, it is unlikely that any set of teacher certification or accreditation standards could fulfill all of the outcomes for two reasons: First, many of the results will be in conflict, so fulfillment of one will necessarily mean the obviation of another. For example, if we wish to emphasize cultural pluralism with multiple values in education, we will violate the wishes of those who seek a single universal set of cultural values as a prerequisite for citizenship. Second, limited resources will also likely preclude our meeting all of the possible educational outcomes that might have some value, even if all were considered to be favorable with no conflicts among them. Accordingly, we must provide appropriate weights or utilities for each outcome or teacher behavior in order to specify a measure of its value relative to other possible outcomes or teacher behaviors. This can be done by obtaining ratings from representatives of the various constituencies on a utility scale. Procedures for implementing this approach are found in many sources (Chernoff and Moses 1959; Siegel 1959). At best these approaches will only permit a relative ranking of outcomes or teacher behaviors under certain restrictive conditions (Arrow 1963; Sen 1970). But they do represent a reasonable basis for differentiating among the importance of different outcomes or teacher behaviors.

(3) Specification of Teacher Characteristics Associated with Each Outcome

Once we have specified and set a value on the different educational outcomes or teacher behaviors, it is necessary to specify which particular observable or measurable characteristics of teachers will indicate the attainment of the educational outcome or the existence of the teacher behavior. In the case of educational outcomes, we must know which measurable or observable aspects of teachers are connected with each outcome or behavior. For example, if the outcome is mathematics proficiency of students, we might posit that a set of teacher characteristics such as mathematics competence, knowledge of techniques of curriculum construction in mathematics, and so on are associated with the outcome. These connections might be drawn from research literature, professional judgments, and common sense. They might also be associated with an estimate of the probabilities by which it is believed that the presence of the teacher characteristic will result in the desired outcome. Such a probability serves to express a degree of certainty or uncertainty about these relationships.

(4) Specification of Alternative Methods for Assuring the Presence of the Teacher Characteristic

Following the specification of desirable outcomes, their social values, and measures or indicators of associated teacher characteristics, we explore the possible alternatives for certification or program accreditation. For example, if mathematics knowledge is one of the teacher characteristics that we have deemed to be related to mathematics outcomes for students; we might ask how we can assure that teachers have this characteristic. One possibility is that of program accreditation, where we monitor and evaluate programs to assure that no teacher passes through the program without partaking of particular educational experiences. A second approach would be an external examination for certification. A third approach would be the observation of prospective teachers by qualified evaluators while the former are carrying out teaching internships. Each of these is also associated with a different probability of meeting this requirement.

In addition to specifying the alternatives for assuring the presence of the particular teacher characteristic, we must assess the costs of each alternative. For example, some of the alternatives will require rather substantial testing or observation programs, while others will only require the accreditation of training programs with no government testing or observation of teachers. Let us assume for the purposes of this exposition, only the cost of obtaining the information on teacher characteristics. That is, different information requirements for assuring the attainment of particular standards may also entail differences in training programs. But, we will concentrate only on differences in costs of obtaining and utilizing the information on certification or program accreditation.

Previously, we set out three types of informational requirements for certification purposes: educational and training characteristics of the potential teacher--e.g., completion of requirements in an accredited program; knowledge of personality attributes that can be ascertained through direct observation of trainees or prospective teachers. According to the analysis that we set out above, it is the latter which is most likely to provide reliable information on teacher performance followed by the testing approach with the accredited program approach delivering the least reliable information on teacher characteristics. But, the observation approach is also very expensive relative to the other two. In order to provide information on teacher behaviors through observation, it is necessary to utilize trained observers who obtained data on the prospective teacher in a variety of different situations and settings. The resource costs for doing this are very high relative to either testing programs for proficiencies or certification on the basis of completion of an accredited program. The latter requires only that programs be reviewed periodically and that graduates provide proof that they have completed such programs. How are we to choose among the three approaches or combinations of them?

Cost-Utility Comparisons

Given the types of data that we have set out, we can proceed in the following way to make cost-utility comparisons. Recall that the previous four stages enabled us to obtain the following information:

1- educational outcomes or teacher behaviors

2- utilities or social values of each of the outcomes or behaviors

3- specification of measurable teacher characteristics associated with each outcome or teacher behavior

4- probability that the existence of the particular characteristic will produce the educational outcome or teacher behavior

5- specification of alternative methods for assuring the characteristic

6- probability that the particular method will assure the characteristic

7- the cost of each alternative method.

Given these data we can construct cost-utility estimates for each alternative method of providing information on teacher characteristics as well as variants of each. The procedure would require that we weight each educational outcome by its utility which is then multiplied by the probability of any particular measure assuring the attainment of the outcome as well as the probability of the particular information approach providing reliable information on the teacher characteristic. Expected utilities can be obtained for each educational outcome while varying the measures of teacher characteristics and alternatives for obtaining the information; or for each alternative method of gathering information while varying educational outcomes and measures of teacher characteristics.

Using a shorthand notation it is possible to calculate the utilities in the following way:

(U_i) (P_{ji}) (P_{kj}) = Expected Utility of fulfilling the i'th educational outcome using the j'th teacher characteristic utilizing the k'th method of assuring the presence of the j'th characteristic.

Where:

U_i = the social utility of the i'th educational outcome $(i = 1,\ldots,n)$

P_{ji} = the probability that the presence of the j'th teacher characteristic will assure the attainment of i $(j = 1,\ldots,m)$

P_{kj} = the probability that the k'th alternative for providing information on teacher characteristics will assure the presence of the j'th characteristic ($k = 1,\ldots,p$). If we divide information methods into three types: (1) program accreditation (2) testing; and (3) direct observation, then ($k = 1, 2, 3$).

Using this approach where values for each of the variables can be ascertained by public opinion surveys in the case of educational outcomes and utilities and subjective judgments by relevant experts in the case of the probabilities, it is possible to estimate utility values for particular educational outcomes as well as their expected values for any particular combination of teacher characteristics and method of obtaining the information.

In addition, it is possible to estimate the costs for each method of obtaining the information by analyzing the resource components that are necessary for each approach. Thus the costs of program accreditation, of a particular type of testing program, or systems of direct teacher observation can be analyzed according to their resource ingredients and costs. The methodology for this has been explicated elsewhere (Levin 1975). Given both the expected utilities and costs of each alternative information system, it would be appropriate to choose that which provides the highest level of utility per dollar of resource allocation among the requisite dimensions of educational outcome. The fact that the solution will vary according to the type of educational outcomes that are reviewed, their estimated utilities, the teacher characteristics which are associated with these outcomes, and the nature of the information system for obtaining data on the teacher characteristics means that there are a large number of alternative components that can be analyzed in constructing an appropriate system.

Even variation within each alternative can be evaluated in the cost-utility context. For example, the greater the number of items in an examination, the higher the reliability of ascertaining the presence or absence of a particular teacher characteristic. But, the larger the number of items, the greater the cost of the examination program. Accordingly, it might be possible to review the cost-utility values for examination programs with different components and of different lengths (Cronbach and Gleser 1965) as well as to apply the same type of analysis to varying the rigor and monitoring of program accreditation or the extensiveness of teacher observations.

A Simple Comparison

It is best to aggregate the analysis by educational outcome since there will be many teacher characteristics associated with each potential educational result. In that way, a cluster of teacher characteristics can be related to any particular educational outcome with respect to the probability of achieving that outcome in the presence of those characteristics. Then each information alternative that might be used as the basis for certification or program accreditation might be explored with respect to the probability of providing information on that set of teacher characteristics as well as costs. All of these data can be combined to assess the respective costs and utilities of the different approaches.

A very simple example is shown in Table One. These data are contrived for purposes of illustration, so that they should be considered

TABLE 1

Illustration of Cost/Utility Comparison

Educational Outcome_i = mathematics achievement appropriate to grade level.

U_i = 10 on a 10 point scale.

j'th Teacher Characteristic - knowledge of mathematics at appropriate level.

P_{ji} = .25

P_{kj} = .3 for program accreditation; .9 for testing proficiency; .7 for direct observation

Cost = $1.00 per candidate for program accreditation.
$2.00 per candidate for testing.
$10.00 per candidate for direct observation.

Method	Expected Utility	Cost	Cost/Utility
Program Accreditation	.75	$1.00	$1.33
Testing	2.25	2.00	0.89
Observation	1.75	10.00	5.72

as a hypothetical use of the analysis rather than an actual comparison. The particular educational outcome that is posed is mathematics achievement of students at the appropriate grade level. The social utility assigned to this outcome is 10 on a 10 point scale. The particular teacher characteristic that is evaluated is the knowledge by the teacher of mathematics at the appropriate level, and it is deemed that the possession of that knowledge yields a .25 probability that students will meet the educational outcome. The respective probabilities for the three methods of information for certification purposes is .3 for program accreditation; .9 for testing; and .7 for direct observation. The respective costs per each candidate are $1.00, $2.00, and $10.00.

Multiplying the utility of the outcome by the probabilities yields an expected utility for program accreditation of .75, for testing of 2.25, and for observation of 1.75. Thus, the testing approach shows the highest expected utility followed by the observation option, and the lowest one is indicated for program accreditation. But, program accreditation is also associated with the lowest cost followed by testing and then observation. When the costs and utilities are combined, the optimal choice is the testing approach with a cost of only $0.89 per unit of utility. Program accreditation costs about $0.44 more per unit of utility, and observation costs almost $5.00 a unit more.

Of course, the order of the cost/utility results might change from teacher characteristic to characteristic, so it is best to take clusters of characteristics for each educational outcome and analyze these as a group. This is particularly important where there are cost-economics involved in any particular information approach so that it does not cost much more to observe or test multiple characteristics of teachers than it does to observe or test a single one. That is, the high fixed costs associated with the strategy mean that the marginal or additional cost for gathering data on a particular behavior are rather small in contrast with the high fixed costs (Levin 1975:105-110). This also suggests that the analysis be carried out among alternative information systems with respect to all of the types of relevant information that they might provide rather than doing it strictly on an educational outcome or teacher characteristic basis.

Summary and Implications

The problems inherent in the construction of systems of teacher certification or program accreditation are unusually severe. Conflicts among constituencies in what are desirable educational outputs as well as a lack of knowledge-base by which teacher characteristics can be associated with particular outcomes are severe obstacles to the design of a new approach to teacher certification. Rather, such a system must be based upon some agreement on objectives and a reasonable knowledge of the relationship between measurable teacher characteristic and these outcomes. Given the formidable gaps in our knowledge about teacher effectiveness and inherent conflicts among different constituencies on desirable educational objectives, how is it possible to design a new system for certifying teachers and other educational professionals?

In this paper we have suggested that the area of the economics of information might provide a framework for addressing this issue. The economics of information is relevant because the provision of a system of certification is an exercise in establishing the eligibility of persons to teach on the basis that they meet these requirements. In order to ascertain whether they meet these requirements we must develop a system of information, and each alternative for constructing that system is associated with a potentially different value to society and a different cost. Since the economics of information represents a way of evaluating the relationship between the costs of information and its usefulness, it is suggested as an appropriate approach to apply to teacher certification and program accreditation.

In particular, we applied a cost-utility framework to this issue, by setting out a method for evaluating both the social value or utility of particular certification approaches as well as their costs. The usefulness of this methodology is twofold. First, it may be possible to use it to construct formal calculations of costs and utilities of different alternatives. Second, it gives a heuristic framework for asking questions about designing new systems of obtaining information for teacher licensing, certification, and program accreditation. That is, the method requires the exploration of any proposed modification by asking questions about the changes in social utility embodied in the alteration of standards as well as changes in costs. The method also enables the analyst to decompose the problem into its specific components including the specification of educational outcomes or teacher behaviors, of utilities or social values of these outcomes or behaviors, of specific teacher characteristics associated with such outcomes or behaviors as well as the probabilities of the presence of particular teacher characteristics producing those outcomes, of the probability of alternative certification approaches identifying and obtaining appropriate teacher characteristics, and of the associated costs of alternative certification or accreditation approaches.

The value of the cost-utility application of the economics of information to this problem is that it enables us to make more systematic our analyses while still permitting a great deal of subjective evaluation. But in this way the method of analysis as well as the subject aspects become more explicit so that they can be fruitfully evaluated and debated by persons who have not been involved in the initial formulation of recommendations for implementing a new approach (Rivlin 1971). While this may not reduce the heat associated with the debate on changing requirements for teacher certification, it may increase the light.

BIBLIOGRAPHY

Arrow, K. J. Social Choice and Individual Values: (New York: John Wiley and Sons, Inc., 1963).

Averch, H. A., *et al*. *How Effective is Schooling?* (Englewood Cliffs, N. J.: Educational Technology Publications, 1974).

Chernoff, H. and L. Moses. *Elementary Decision Theory*. (New York: John Wiley and Sons, Inc., 1959).

Conant, J. *The American High School Today*. (New York: McGraw Hill Book Co., 1963).

Coleman, J., *et al*. *Equality of Educational Opportunity*. (Washington, D.C.: Government Printing Office, 1966).

Cronbach, L. J. and Gleser, G. C. *Psychological Tests and Personnel Decisions*. (Chicago: Illini Books, 1965).

Educational Testing Services. *Statistical Studies of Selective Service Testing*. (Princeton, N.J.: ETS, 1955).

Friedman, M. "The Role of Government in Education," in *Capitalism and Freedom*. (Chicago: University of Chicago Press, 1962).

Haven, E. W. *The Freshman Norm Sample for the General Examination Program*, Statistical Report SR-67-32. (Princeton, N.J.: Educational Testing Service, 1967).

Heath, R. W. and M. A. Nielson, "The Research Basis for Performance Based Teacher Education," *Review of Education Research*, Vol. 44, No. 4 (Fall, 1974).

Koerner, J. D. *The Miseducation of American Teachers*. (Boston: Houghton Mifflin, 1963).

Levin, H. M.(ed.) *Community Control of Schools*. (Washington, D.C.: The Brookings Institution, 1970).

Levin, H. M. "Cost-Effectiveness Analysis in Evaluation Research," in *Handbook of Evaluation Research*, M. Guttentage and E. Struening (eds.), Vol. 2 (Beverly Hills, Calif.: Sage Publications, 1975), pp. 89-112.

Rivlin, A. *Systematic Thinking for Social Action*. (Washington, D.C.: The Brookings Institution, 1971).

Rosenshine, B. and N. Furst. "The Use of Direct Observation to Study Teaching," in Robert M. W. Travers (ed.), Second Handbook of Research on Teaching. (New York: Rand McNally, Inc., 1973).

Sen, A. K. Collective Choice and Social Welfare. (San Francisco, Calif.: Holden-Day Inc., 1970).

Siegel, S. "Theoretical Models of Choice and Strategy Behavior," Psychometrika, Vol. 24, 1959, pp. 303-316.

Smith, R. A.(ed.) Regaining Educational Leadership: A Critique of PBTE/CBTE. (New York: John Wiley & Co., 1975).

Stigler, G. J. "The Economics of Information," Journal of Political Economy, (June 1961).

Travers, Robert M. W. (ed.) Second Handbook of Research on Teaching. (New York: Rand McNally, Inc., 1973).

Weisbrod, B. A. External Benefits of Public Education. (Princeton: Industrial Relations Section, Princeton University, 1964).

Wolfe, D. America's Resource of Specialized Talent. (New York: Harper and Brothers, 1964).

CHAPTER 6

NATIONAL AND REGIONAL ACCREDITING FOR PROFESSIONAL EDUCATION PROGRAMS

Lindley J. Stiles

The issues involving national and regional accrediting are related to state program approval but also clearly extend beyond state functions and activities. This paper examines the historical effect of political, and social forces on current national and regional accreditation of professional educational programs.

The author asserts that there are inadequate resources (human and fiscal) in present accreditation organizations (state, regional, and national) to discharge the obligation of quality work. As a consequence, there is growing dissatisfaction with present monitoring and review procedures because they are in many instances poorly implemented and/or administered. The author discusses the extent to which the National Council for Accreditation of Teacher Education (NCATE) has been a target of such criticism.

According to the author, concerns about NCATE accrediting activities include: 1) its ability to screen out institutions who do not meet present standards; 2) ambiguity regarding the definition of standards and their application from one institution to another; and 3) the training and abilities of evaluators who make on-site visits. These problems are further compounded by the limited resources available for developing and evaluating alternative processes and procedures.

Drawing on the various problems associated with NCATE, the author concludes his paper by presenting and discussing several proposals which are designed to remedy present NCATE deficiencies. One of these proposals, advocated by the author, is to have NCATE become a national accrediting agency to monitor/approve state program approval operations. The advantages of this system are that NCATE would provide: leadership to states, define minimum standards to assure nation-wide compliance, and act as a non-governmental agency with greater control to enforce high quality standards for state accrediting programs.

National and Regional Accrediting for Professional Education Programs

Lindley J. Stiles *

Deliberations about accrediting require clear understanding of what the process is or is not. Confusion about meaning is the cause of much of the dissatisfaction that now prevails regarding accrediting agencies and practices in the field of education.

Accrediting is a process of certifying that an institution is meeting prescribed standards of academic or professional excellence. It differs from the function of chartering which means authorization to function. It is not a means of attesting or guaranteeing that individuals are qualified to practice a profession which is called certification or licensing.[1]

With respect to professional education programs, the greatest confusion generates from the erroneous assumption that accrediting and licensing are equivalent functions. In reality, these are two separate processes which serve different and distinct purposes. Accrediting, when applied to professional education programs, aims to assure that colleges and universities, as well as school systems in which clinical professional training occurs, maintain acceptable standards. Licensing aims to guarantee that individuals are qualified to practice.

In the field of education, and in some states but not all, licenses to practice are awarded automatically to graduates of teacher education programs accredited by the National Council for Accreditation of Teacher Education, NCATE, the official national agency for undergraduate pro-

---

* Professor of Education for Interdisciplinary Studies, Sociology and Political Science, Northwestern University

fessional schools that grant the minimum of the bachelor's degree and advanced graduate professional preparation. The more common practice in other professional fields is to require candidates for licensure to prove individual qualifications whether or not they have graduated from accredited professional schools. The intent is to provide two types of protection for the public, clients, and members of the profession itself. One assures that professional schools are maintaining acceptable standards; the other attests that an individual is competent to practice.

The confusion about accrediting and licensure in the field of education may stem, in part at least, from the traditional practice of admitting graduates of accredited high schools to certain colleges and universities without their having to pass qualifying tests. Admission to professional practice, however, is a matter of much greater consequence than determining eligibility for enrollment in an educational program. A student admitted to college because of graduation from an accredited high school still must prove ability to meet the academic standards maintained. A person licensed to practice faces no further qualification tests of individual competence.

Another confusion about accrediting is the assumption, promoted by NCATE, that the process aims primarily to improve rather than to approve. Without prescribed minimum standards, an accrediting body operates with a "rubber ruler" with no means of differentiating weak programs from the strong. Yet, it may be unfair to judge a small rural college by the same standard developed for a comprehensive urban university. Perhaps the need is for alternative, but precise, standards suited to the different types of programs accredited.

The idea of regional accrediting may need examining more carefully to determine whether it is a viable possibility for accrediting professional educational programs. Cooperation between states so far tends to come from elitist motivations, entered into by states that want to achieve common goals and reciprocity relationships, rather than those geographically situated near each other.

Confusion prevails, too, about the idea of voluntary accrediting, and about whether a process that aims to protect the public and students should be left to private initiative. Rarely is accrediting voluntary in a strict sense of the word and public protection is a public matter.

Who should accredit? is a question that sparks disagreements. At the national level, teacher educators have fought to keep control of NCATE; at both the national and state levels the professional teachers' associations are pressing for control of accrediting and certification processes. Academic professors, state department officials, classroom teachers of various specialities, school board members, and other educational consumer groups have been given only token voices.

Purposes of Accrediting

The key purpose of accrediting in professional schools is to attest to the public and prospective students that a program of preparation meets defined minimum standards of quality. John Mayor, in one of the more extensive studies of Accreditation in Teacher Education, listed five purposes of Accrediting:[2]

1. Service to public. Accreditation is supposed to guarantee to the citizen quality in an institution of higher learning.

2. Institutional improvement. Minimum standards, the initial accreditation, and the periodic re-evaluation visitations are seen as a major thrust for the improvement of teacher education.

3. Facilitating transfers. The establishment of national standards or norms allows college and university admissions officers to make easier and more rapid judgments regarding the admission or graduation of a student, and the movement of a student on to the next level of matriculation.

4. Raising standards of the profession. An important objective of accreditation is to raise the standards of education for the practice of a profession.

5. Information for prospective employers. Accreditation is taken as proof of the quality of training which a graduate from the institution has received.

The specific goals the National Council for Accreditation of Teacher Education purports to serve are:[3]

a. To assure the public that particular institutions--those named in the Annual list--offer programs for the preparation of teachers and other professional school personnel that meet national standards of quality.

b. To ensure that children and youth are served by well-prepared school personnel.

c. To advance the teaching profession through the improvement of preparation programs.

d. To provide a practical basis for reciprocity among the states in certifying professional school personnel.

Of these stated goals, the first three are generally endorsed: e.g., to attest the quality of programs to the public and, one might add, to prospective professionals; to protect students whom practitioners serve; and to advance the profession. The fourth listed objective illustrates the confusion that prevails about the meaning and goals of accrediting and licensing, to which reference has been made. Actually, this fourth purpose is in conflict with the second and third statements. Students are not protected nor is the profession advanced by the automatic licensing of every individual who is graduated from an accredited program of teacher education. As mentioned, individual qualifications for licensing should be verified regardless of the institution attended--as a double-check to protect students taught and the profession. Reciprocity between states in certifying professional school personnel can be a worthy goal only if licenses issued are based on valid evidence of individual qualifications for practice. Almost half of the states have recognized this fact and refused to license automatically graduates of NCATE teacher education programs.

To appreciate the varying expectations of accrediting in different types of institutions, it helps to examine the historical background of the process in the United States. Out of such perspective, the current practices and problems of state, regional and national accrediting for professional programs in education can be analyzed.

Historical Background of Accrediting

In most countries, accrediting is a function of government which charters institutions. In the United States a process of voluntary or self-accrediting was invented, in the 1870's, because states were failing to police the quality of schools and colleges.[4] Much earlier, however, in 1787 New York State had begun to accredit colleges. The term, voluntary, is a misnomer. Since the basic notion of accrediting is to distinguish between quality and mediocre programs or institutions; once a system of accrediting has been established, colleges and universities are under compulsion to seek approval.

Elitist and Authoritarian Roots

The idea of self-accrediting generated from the ambitions of strong institutions to mirror their own quality as a model for others to emulate. The Association of American Universities, which for years never had more than forty members, performed its own accrediting.[5] Membership was a matter of distinction, preserved for the few and denied to the many. Other early accrediting associations had similar objectives.[6]

Elitist motivations led to authoritarian practices. The tendency in all accrediting bodies is for those who belong to impose their standards on those who seek admission. Authoritarianism was evident, also, in efforts by colleges to accredit high schools. Graduate schools have assumed elitist postures and followed authoritarian procedures in accrediting undergraduate colleges. Similarly, professional schools have banded together in elitist groups to impose standards on non-members, often using legal compulsions in the process.

Accrediting of High Schools by Universities

An early example of authoritarianism in accrediting in this country was the efforts of universities to impose standards on high schools. Since our system of education grew from the top down, with the creation of colleges running ahead of high schools, the need was to qualify more students for college work. A first approach was for colleges and universities to establish their own preparatory schools. As the number of secondary schools expanded, the need was to assure that graduates of the new secondary schools were qualified to do college work.

The first step in accrediting high schools came with the practice of state universities certifying the quality of secondary school programs. The University of Michigan imported the practice in the 1870's from the German universities. Other state universities copied the pattern. It was completely involuntary as far as the high schools were concerned, imposed on them by their state universities. The procedure followed was for the university to develop lists of secondary schools which purportedly met prescribed standards. Graduates of these "approved" high schools were permitted to enter college without having to pass an entrance examination or attend a preparatory school for a year or two. Most of the early lists were compiled from the records which graduates of high schools established in the universities. Later, a faculty member, called "High School Visitor" was assigned to visit high schools to ascertain the quality of their programs. Because being on the "University Accredit List" made it easier for graduates to get into college, parents and the public came to cherish the rating, an attitude that has continued up to the present.

As it became apparent that students were going to cross state lines to attend college, institutions of higher learning began forming regional associations to "accredit" high schools. At first, lists of high schools accredited by their state universities were merely exchanged. Later, near the end of the century, the regional accrediting associations were formed, beginning with the New England Association of Colleges and Preparatory Schools, in 1885. Ultimately, six such associations included all the states, with the largest comprised of twenty states being formed in 1895, the North Central Association of Colleges and Preparatory Schools.

Ultimately "approved" secondary schools won shared control of the process and self-accrediting became a reality. Inasmuch as graduate schools needed assurances that graduates of undergraduate colleges were prepared for advanced programs of study, the Regional Accrediting Associations began to self-accredit colleges as well as high schools. The two accrediting functions were managed by two Commissions; one for the high schools and one for the colleges. State Committees, headed originally by professors in the university and later in some states by personnel in state departments of public instruction, managed accrediting processes in each state.

In the 1940's the North Central Association of Colleges and Secondary Schools pioneered a new component of accrediting. It attempted by the use of an extensive list of evaluative criteria to stimulate high schools to improve themselves beyond minimum levels necessary to be accredited. Involved in the process was the idea of self-study by the school faculty followed by a visit by an outside "Evaluation Committee" composed of faculty members of other high schools and institutions of higher learning in the state. For the first time, high schools were asked to develop their own philosophies and objectives which served as the guidelines for the application of the "Evaluative Criteria". The effect was to move away from rigid standards toward flexible guidelines.

Professional Accrediting

With the growth of professional education, a proliferation of professional accrediting associations occurred. By 1940, over 300 accrediting bodies were in the business of visiting and attesting to the quality of various types of collegiate, graduate and professional schools. A department of chemistry in a university, for example, might be accredited by as many as three or four different agencies, some being the arms of professional societies while others were sponsored by associations of chemistry professors themselves.

Dealing with the multitude of accrediting bodies had become a costly and time-consuming task for large comprehensive universities. One institution, for example, might have two or three visiting accrediting committees on the campus at the same time. Often different accrediting reports prescribed conflicting mandates for departments or programs. Each agency demanded increasingly higher fees to cover accrediting costs. Clearly, the universities had created a Frankenstein that was out of control. University presidents rebelled, led by those in the Association of Land Grant Colleges and Universities.

A moritorium on accrediting was declared and a Committee headed by President Gustavson of the University of Nebraska was appointed to determine which agencies would be recognized by the universities. Out of this committee's report came the National Commission on Accrediting, established in 1949, whose function it became to charter and accredit accrediting agencies. The Commission (now called the Council on Postsecondary Accreditation) first undertook to reduce the number of approved professional accrediting associations to sixteen. Pressures from powerful professional groups, however, moved the number upward to its present list of 53 "approved accrediting agencies," which includes a number of private accrediting bodies and the six regional accrediting associations.[7]

Accrediting of Teacher Education

The history of accrediting of teacher education runs counter to the pattern in other professional fields. It began with the less prestigious institutions, the teachers colleges, rather than with the elite state and private universities. The first lists of "accredited" institutions included all the membership of the American Association of Teachers Colleges (now the American Association of Colleges for Teacher Education, AACTE, an organization made up of former teacher colleges and schools of education in universities). When the teachers colleges and schools of education merged into one organization, the "Accredited List" blanketed in all the members of both organizations.

The National Council for Accreditation of Teacher Education, NCATE, was formed in 1952, by the AACTE when the National Commission on Accrediting refused to approve accrediting bodies that were membership organizations. The first lists of NCATE contained all those institutions that had been blanketed in as members of the AACTE. Thus, accrediting in teacher education has moved from a listing of the membership of a professional association toward efforts to discriminate between strong and weak institutions.

The history of NCATE has been an unhappy one. Its early standards fit the teachers college type institutions better than they did the university schools of education. When NCATE attempted to force the universities to adapt their programs to the prescribed standards, resistance developed. Matters came to a head in 1963 when the University of Wisconsin School of Education refused to comply with NCATE's prescriptions and withdrew its application for accreditation.[8] NCATE responded by generating nationwide pressures in the education establishment against the University of Wisconsin. The ensuing controversy exposed the restricted image that NCATE had of teacher education, its lack of due process accountability to any professional group, and the power tactics it was willing to employ to enforce "voluntary" accrediting. As a consequence, the National Commission on Accrediting refused to give NCATE its full approval until it had developed new standards and modified its procedures.

Subsequently, the AACTE, historically the chief sponsor of NCATE, formed a committee to develop new standards for accrediting teacher education programs. The committee's recommendations for standards were adopted by NCATE in 1970 and became effective in 1971-72. Since then, the Committee on Standards has been incorporated into the NCATE organization and is composed of two members from AACTE, two from the NEA and two representing other sponsors. Presently NCATE standards are under review by the new committee.

State Accrediting of Professional Programs

While the so-called voluntary accrediting processes were flourishing, various states moved into the business of approving programs of preparation for work in the field of education. New York State, of course, began legally accrediting colleges as early as 1787. Its Regent's Examination has long been used as a means of qualification for college, particularly in the Eastern states. The New York State Department of Public Instruction carries on its own program of accrediting for certification purposes and refuses to blanket in graduates of "NCATE APPROVED" institutions. Other states have undertaken to accredit programs to prepare educational personnel, usually in cooperation with the National Council for Accreditation of Teacher Education, but some independently.

A strong stimulus for state departments of education to accredit teacher education programs came with the adoption of the "program approval" approach to teacher certification. A decision to permit colleges and universities to decide who should be licensed to practice necessitated the evaluation of institutional preparation programs. Thus, state departments of education became accrediting agents, approving programs as a basis for automatic licensure.

Federal Involvement in Accrediting

From 1867 to 1911, the United States Bureau of Education (now the Office of Education) published lists of "recognized" colleges. The original intent was not to make qualitative judgments but merely to indicate the institutions the government recognized as legitimate colleges. When, in 1912, the federal government sought to devise a ranking of the list, the question of quality became a central issue. The controversy generated led to the Association of American Universities taking over responsibility for publishing the list in 1913.

Since this early experience, the federal government has maintained a low profile with respect to accrediting. It now maintains, as a consequence of a congressional mandate, a list of "accredited" professional programs in education but it does not actually do accrediting. The practice came from a decision of the Congress to specify that federal research grants and contracts could go only to accredited institutions. The action was encouraged by supporters of the National Council for Accreditation of Teacher Education as a means of bringing pressure on teacher preparing institutions to "volunteer" to be accredited. The U. S. Commissioner's list of accredited institutions includes those approved by NCATE and certain other accrediting agencies, such as the Board of Regents of New York State, the Regional Accrediting Agencies, etc. In effect, a university remains on the approved list if the regional accrediting association accredits them, whether or not they are NCATE approved.

Governance of Accrediting Bodies

A key question about accrediting concerns who should do it. Originally, universities appointed themselves as the accreditors of high schools. Graduate schools, similarly, have maintained lists of undergraduate colleges that are "approved." In the six regional accrediting associations, high school principals and administrative officers of colleges and universities elect the commissions that make accrediting judgments. State officials are responsible for accrediting decisions in Departments of Public Instruction.

Control of accrediting in professional fields generates competition between deans and professors in the professional schools and their graduates who are the practitioners. In the field of law, the practitioners have already won the battle in many states, prescribing through their association what legal education should be. In medicine an uneasy truce is being maintained that makes accrediting a joint responsibility of practicing doctors and medical educators. In engineering, the Engineer's Council for Professional Development manages the operation. Similarly, in other professional fields the power struggle goes on.

Since its establishment, the National Council for Accreditation for Teacher Education, NCATE, has confronted an on-going power struggle for its control. But here the battle is complicated by additional contestants for power. Because the preparation for teaching involves a heavy emphasis on the liberal arts and academic disciplines, representatives of such fields in colleges and universities argue that they should have a voice in the accrediting decisions. Inasmuch as state departments of public instruction have been called upon to license automatically graduates of "NCATE APPROVED" programs, chief state school officers and directors of teacher education in such organizations have sought and won representation on the coordinating board of NCATE. Similarly, school board members have gained representation on NCATE's Coordinating Board on the grounds that they represent the consumers.

The National Council for Accreditation of Teacher Education, NCATE, has attempted to resolve the power struggle for control of accrediting by including on its Coordinating Board and the Council (which has the power to set policies) representatives of all groups concerned with teacher education. But the competition for control continues. In some instances, power is being purchased outright through negotiated agreements regarding budgetary support for NCATE. In September, 1972, for example, the National Education Association reduced its financial support for NCATE. Its contributions dropped from $42,630 in 1971 to $15,708 in 1973. The loss of financial support was a critical blow to the National Council endangering its survival. Subsequently, the NEA negotiated an agreement with NCATE to gain one-third of the membership on the Coordinating Board and Council in return for renewal of financial support at the level supplied by the American Association of Colleges for Teacher Education. The new revised membership formula provided for one-third of the membership of its two key sub-committees, the Coordinating Board and Council, to come from the NEA;

one-third to come from the AACTE, and one-third to come from eight other constituent members, one from each.

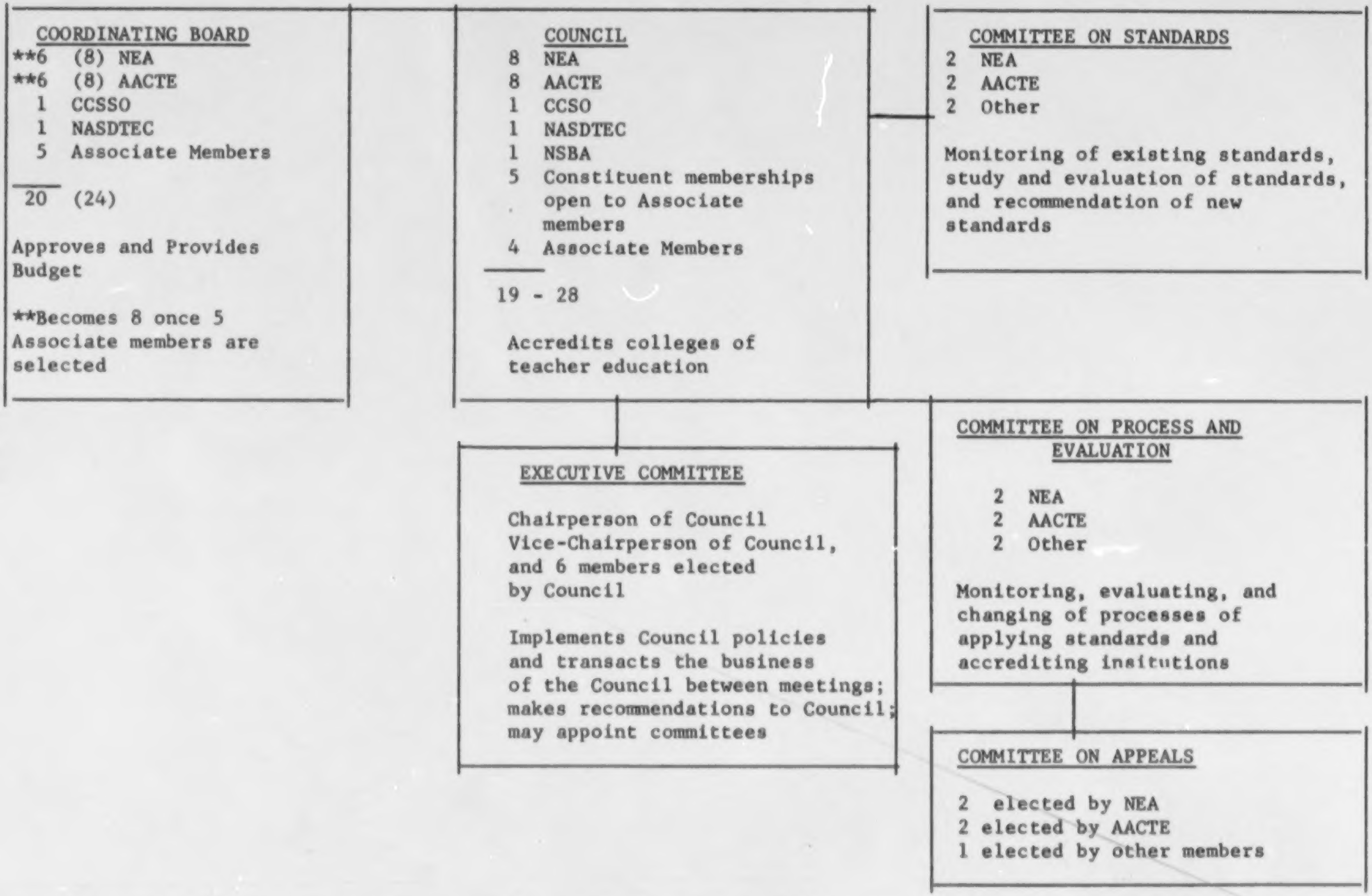
At present the NCATE Council that acts on accrediting recommendation of a smaller Committee on Process and Evaluation, is composed of eight representatives from the NEA, eight from the AACTE, one from the Council of Chief State School Officers (CCSSO), one from the National School Boards Association (NSBA), one from the National Association of State Directors of Teacher Education and Certification (NASDTEC). In addition, five memberships are in the process of being filled from associate representatives of groups such as the Student NEA, the Association of Teacher Educators and the National Council of Teachers of Mathematics and other similar groups. Associate memberships (without voting rights) are a first step toward gaining constituent membership status.[9] The new Committee on Standards has two members from the NEA, two from the AACTE, and two others, as does the Committee on Processes and Evaluation.

NCATE Visiting Teams typically are drawn from faculties of colleges and universities, professional organizations and learned societies, and state agencies. They are usually composed of six persons for undergraduate programs of teacher education and nine or ten members for institutions that offer both undergraduate and graduate programs. At least two practitioners must be on each team, one of whom must be a classroom teacher and the other may be some other type of practitioner specialist.

Thus, power in national accrediting professional programs in education is shared by representatives of the AACTE and the NEA, with eight votes each, while eight other constituent organizations have one vote each. Control is closely related to financial support: The NEA and AACTE

NATIONAL COUNCIL FOR ACCREDITATION OF TEACHER EDUCATION

ORGANIZATIONAL CHART - Effective 1974*



COORDINATING BOARD

**6 (8) NEA
**6 (8) AACTE
1 CCSSO
1 NASDTEC
5 Associate Members

20 (24)

Approves and Provides Budget

**Becomes 8 once 5 Associate members are selected

COUNCIL

8 NEA
8 AACTE
1 CCSO
1 NASDTEC
1 NSBA
5 Constituent memberships open to Associate members
4 Associate Members

19 - 28

Accredits colleges of teacher education

COMMITTEE ON STANDARDS

2 NEA
2 AACTE
2 Other

Monitoring of existing standards, study and evaluation of standards, and recommendation of new standards

EXECUTIVE COMMITTEE

Chairperson of Council
Vice-Chairperson of Council,
and 6 members elected by Council

Implements Council policies and transacts the business of the Council between meetings; makes recommendations to Council; may appoint committees

COMMITTEE ON PROCESS AND EVALUATION

2 NEA
2 AACTE
2 Other

Monitoring, evaluating, and changing of processes of applying standards and accrediting insitutions

COMMITTEE ON APPEALS

2 elected by NEA
2 elected by AACTE
1 elected by other members

* Source: National Education Association, Teachers Can Change Teacher Education, (Washington, D.C. ; NEA), August 1975

provide, on a fairly equal basis, almost 90 per cent of NCATE's budget, excluding the amount collected from institutions through accrediting fees. Constituent members of NCATE, other than the NEA and AACTE, have only token representation and make only token contributions to its budget. It is a clear case of "he who pays the fiddler calls the tune." The NEA, after withdrawing financial support, bought back into NCATE at a power level equal to that of the AACTE. Other bodies with lesser financial resources are relegated to minority status. Ironically, professors of liberal arts and academic disciplines who provide from seventy to eighty per cent of the prospective teachers' preparation and the lay public that employs the graduates, fall into the minority representation category.

Relationship of Accrediting Bodies to the Federal Government

The Federal Government is involved in accrediting in two basic ways: it conducts with cooperation from appropriate Regional accrediting associations accrediting of dependent schools; and it maintains a list of accrediting associations (presently includes sixty-five) whose members are eligible to receive grants and student loan funds and contracts. Increasingly, the United States Office of Education is coming to recognize state department of education accreditation. The so-called Mondale Amendment to the Education Amendments Act of 1972 required the Commissioner of Education to "publish a list of State Agencies which it determines to be reliable authority as to the quality of public postsecondary vocational education in their respective states for the purpose of determining eligibility for all Federal student assistance programs."[10]

The question as to whether the decisions of "voluntary" accrediting bodies are legally binding has been considered by Federal Courts. In July, 1969, the United States District Court of the District of Columbia ruled in favor of a suit by the Marjorie Webster Junior College against the Middle States Association of Colleges and Secondary Schools. The Accrediting Association had refused to consider the college for accreditation on the grounds that it was a proprietary operation. Subsequently, on June 30, 1970, the Court of Appeals reversed the decision and in September, 1970, the Supreme Court refused to review the Court of Appeals reversal.[11] Marjorie Webster College claimed that the Middle States Association maintained a monopoly in the accrediting process, that it violated antitrust laws, that its actions were governmental in nature and that denial of accreditation damaged the institution. Although the case was lost, the controversy continues.[12] The Court of Appeals assumed, without deciding, that Federal recognition of the Middle States' activities rendered them state action in a constitutional sense. Thus, the quasi-legal status of voluntary accrediting was established for the first time.

Federal policies influence accrediting standards in other ways. The Civil Rights Legislation and subsequent administrative mandates have directly influenced staffing policies, the selection of students, and, as often alleged, academic standards. The open records mandate is changing institutional procedures. The Professional Development Projects introduced new patterns of teacher preparation. In such instances of Federal influence, accrediting decisions must be adapted to respond.

Voluntary Accrediting and State Approval

State influences on voluntary accrediting and vice versa are more pronounced. NCATE has worked in collusion with state departments of education to achieve automatic licensing of graduates of approved programs in more than half the states. The objective, of course, is to facilitate reciprocity between states, and hence, easy transfer of personnel from one state to another. A side effect has been to make NCATE accrediting decisions state policy. This type of automatic licensure places a vital responsibility on the institutional accrediting process that cannot be assumed; namely, the guarantee of individual professional competence.

In states where state accrediting is practiced, institutions are confronted with costly and duplicatory procedures. It is not unusual, for example, for a School of Education to face regional, state and NCATE accrediting over three consecutive years. Each agency may require different sets of forms to be completed. Each may require a self-study. Each may require that a visiting team spend several days in the institution validating the information provided. NCATE requires that an institution must have regional accrediting to be considered for professional accrediting. If the state accredits, also, it may or may not require prior regional accrediting. The state may accredit institutions not accredited by NCATE, often simply because the latter cannot service all the institutions that want to be accredited.

The need for state accrediting is documented by the fact that NCATE has never been able to evaluate more than about one-third of the 1380 institutions that prepare teachers. An early assumption that NCATE accreditation would eventually reduce the number of colleges and universities preparing professional personnel to the number accredited has not been borne out in practice. Political factors as well as unreliability of accrediting decisions operate to permit colleges and universities to prepare educational professionals without being accredited and often with little loss of status, if any. Thus, state departments of education are forced to develop accrediting services to fill the void.

Processes Used by Accrediting Bodies

The accrediting process, whether carried out by a state, regional or national body, involves judging the program and facilities of an institution by defined standards. Typically, the administrators and the faculty of the college or university are asked to prepare an extensive report (a self-study) on how specific standards of the accrediting body are being met. Subsequently, a team of outside evaluators (selected by the accrediting agency) visits the institution (for two or three days) to verify the way in which standards are being met. The report of the Visiting Team and the self-study made by the institution are studied by the Committee on Process and Evaluation of NCATE (composed of 6 members) which makes recommendations to the Council. Action to approve or disapprove the accrediting of the institutions is taken by the twenty-four member Council. Institutions found to be deficient usually are given either a warning or are placed on probation. Provisions for appeal are provided.

NCATE and the Regional accrediting associations follow the practice of re-accrediting institutions every ten years. State re-accrediting may come more often, particularly when substantial changes have taken place in an institution's programs.

Standards in professional accrediting usually relate to such matters as: qualifications of faculty; curricula; student selection, advisement and evaluation; library and physical facilities; budget; and success of graduates in qualifying for licensure, e.g., passing the Bar Examination for law or the Medical Board Examinations for medicine. Where sensitivity about control of programs prevails, as it does in the field of education, the standards may prescribe certain patterns of internal governance. Usually standards aim to define minimum levels of acceptable practice but institutions are urged to set higher standards for themselves and may be judged by how well they are living up to their own goals.

NCATE has experimented with alternate ways to evaluate teacher education programs. Northwestern and Syracuse Universities pioneered a process that substituted for the self-study report and short visit by a large outside committee a "study in depth" by a smaller evaluation committee. Over a period of a year, the smaller committee studied the program of the institution making repeated visits to the campus, collecting its own information, examining records, visiting classes, interviewing staff and students as well as personnel of schools where clinical experiences are provided. The report prepared by the study committee then went to the NCATE Evaluation Board for recommendations and then to the Council for action. Each institution paid the cost of the study. Reports from the two institutions indicated satisfaction with the process but for reasons not clear, other institutions have not adopted it, nor has NCATE given publicity to the alternative pattern. NCATE officials report, however, that the option is still available.

National Accrediting and Professional Associations

Associations of professionals are not enthusiastic supporters of national accrediting, as practiced by NCATE. The National Education Association, however, through its Professional Standards Committee, was one of the original sponsors and financial supporters of NCATE. At the time of the NCATE-Wisconsin confrontation, the NEA and its affiliates obviously felt strong involvement since they hurriedly marshalled extraordinary pressures against the University of Wisconsin to force it into compliance with NCATE's mandates. Such groups had been led to believe by NCATE leaders that "professionalism" was the issue at stake. When it became clear that the standards and prescriptions NCATE maintained, the unrepresentativeness of the Council, and the absence of due-process procedures were the concern, the NEA and other professional groups quickly backed away. Ultimately, the NEA withdrew its financial support for one year until it could negotiate a larger representation of NCATE's key committees, as mentioned earlier.

Professional organizations are just beginning to show interest in accrediting processes, at both state and national levels. Reasons for past low levels of interest in accrediting are obvious. In the first place, NCATE, until the recent agreement with the NEA, was controlled by deans and professors of education. Professionals are now working to control accrediting themselves, as is the practice in the field of law. But until recent accelerations of militancy, they gave a low priority to accrediting operations. Then, too, interest in control of entry into the professions has been focused on state decisions, where practitioner control is easier to achieve. Many professionals are unenthusiastic about granting automatic licensure to graduates of "NCATE APPROVED" institutions, a concern that is intensifying as the over-supply of educational personnel continues. Thirdly, practicing professionals tend to doubt the validity of the standards teacher educators have projected. They are all too aware that accrediting as practiced by NCATE in the past has not eliminated weak programs of professional preparation.

Criteria and Standards for Professional Education Accrediting

A problem in accrediting is the vagueness of criteria used to judge a teacher education program.[13] Consider the following standard of NCATE, for example:

> *The professional studies component of each curriculum for prospective teachers includes instruction in the humanistic studies and the behavioral studies.*

Now, does this standard mean one course in each category mentioned? Should the course be at the first year of college level or at a higher level? or even what would be a good example of a humanistic course in the professional sequence?

Let us take another example:

> *Members of the teacher education faculty have continuing association and involvement with elementary and secondary schools.*

If the words "association" and "involvement" are interpreted literally, few schools of education will meet this standard.

What does this standard mean, to give a final example?

> *Part-time faculty meet the requirements for appointment to full-time faculty and are employed only when they can make special contributions to teacher education programs.*

Should all part-time faculty hold the doctor's degree, a qualification for permanent faculty in all major institutions? And what is meant by "special contribution"?

It is possible, of course, to write standards that are sufficiently specific to permit relatively objective judgments of institutional provisions for the preparation of professionals. One could specify for example, the minimum total score a student has to make on the College Entrance Board Tests to be admitted to a program of teacher education. Then it would be easy to ascertain whether an institution was living up to the standard. Similarly, it would be possible to write a standard that specified the amount of time a student must spend in an internship in order to be graduated from a professional program. But too specific standards bring problems for accrediting associations and for institutions. They permit precise judgments about compliance--an outcome unpopular with all participants in "voluntary" or self-accrediting processes.

Involvement of Professional Groups and Representative of the Public in the Accrediting Process

"They look at themselves and approve" is a criticism most often leveled at self-accrediting operations. Professional groups and the public, whose interests are purportedly being protected, often ask why they cannot help "keep professional teacher educators honest."

Professional groups have gained representation on national and state accrediting bodies. Similarly, school board members have been invited to participate. Little progress has been made to include on accrediting bodies representatives of other interested publics, such as the Parent-

Teachers' Association, various citizen committees for education, or labor unions. New efforts by citizens to regain control of educational programs may well concentrate on accrediting in the future.

The union movement has not yet taken an interest in negotiating control or shared control of accrediting processes. Yet, teachers have the power at the state level to generate political support for their control of accrediting. An argument for the continuing of national self-accrediting bodies, in fact, is that they are free from state-level political pressures that may turn the operations over to professional associations or union groups.

Relationship Between Accrediting and the "Professional" Nature of Education Programs

Accrediting of professional programs aims primarily to attest the excellence of an institution's ability to prepare individuals for professional assignments. In this respect, the process differs from the goals of regional accrediting associations whose intent, primarily, is to certify quality in a high school or college's preparation for next-level academic study.

Professional accrediting typically is concerned with only the professional components of the program of preparation. Attestment of quality in general education and in fields of academic specialization in undergraduate colleges are left to the judgments of regional accrediting bodies. Accrediting agencies for medical schools, for example, do not examine the undergraduate preparations of medical school students, even though such studies may influence markedly a student's intellectual skills, moral values, and humanistic commitments. Similarly, accrediting agencies in the field of education tend to focus primarily on the pedagogical aspects of the programs of prospective educational personnel. NCATE, in its new standards, does require that at least one-third of a student's preparation be in a program of planned "general studies." Another standard prescribes emphasis on the "teaching specialty," a responsibility of academic departments in an institution. It requires, however, that the selection of content in academic areas be the joint responsibility of members of the teacher education faculty and professors in the academic area.

Perhaps a weakness in professional accrediting in education is the evaluation of provisions for supervised practice in teaching. The Standards prescribe that such experiences must be provided in "substantial" amounts over an extended period of time, and under the supervision of qualified personnel from the institution and the cooperating school. As yet, however, little attention has been given to accrediting for professional education purposes the elementary and secondary schools in which the "supervised practice" is undertaken, as is done in the field of medicine regarding teaching hospitals. Nor do the standards deal with matters related to the qualifications, time for teacher education, and commitments of personnel in the cooperating elementary and secondary schools.

Some states have considered providing state support to school systems that help colleges and universities to prepare educational personnel, much as they provide special financial support for programs of special education or driver training. As state departments of education become more involved in determining the quality of teacher education programs, the possibility exists that state funds will be provided to improve the resources and conditions for supervised internships in teaching.

Accrediting of Professional Education in Non-Traditional Programs

Accrediting in all its forms tends to promote standardization. The tendency in establishing standards is to reflect the norm, that which is commonly accepted, rather than the new or experimental. Nevertheless, NCATE's introduction to its new standards espouses to promote experimentation and innovation and expresses the belief that its standards "encourage individuality, imagination, and innovation." It acknowledges that in some cases the standards may not be the best criteria for the evaluation of an innovative professional program. In such instances, institutions are invited to present their experimental programs separately with the rationale for them and evidence that they are achieving their goals.

A problem in accrediting experimental programs relates to the judgments that members of visiting teams may make. Most professionals, even good ones, tend to be threatened by innovations that deviate substantially from traditional practice. Thus, their judgments may be influenced by inner doubts that the new can be better or as good as the old. Appropriately, experimental programs should meet the test of excellence. In practice, however, they tend to be judged more severely than normal practices. As a consequence, many institutions hesitate to experiment; it is simply more comfortable to follow old patterns even though they are known to have deficiencies. All are too aware that accrediting decisions, because they represent group thinking, are norm oriented.

What Should be Done About Professional Accrediting in Education?

Almost a quarter century of experience suggests that national accrediting may not be a viable process in the field of education. NCATE finds it impossible to even consider for accrediting two-thirds of the institutions that prepare educational personnel. Its ten-year span between accrediting inspections allows tremendous variations in quality to take place without appropriate assessments. It has been unable to establish measurable objectives; consequently, accrediting decisions do not differentiate between strong and weak programs. Because NCATE must depend upon the fees of "approved" institutions for support, it operates with a built-in conflict of interest: if it really sets precise standards and disaccredits institutions that do not meet them, it may destroy itself.

The persistence of NCATE in promoting accrediting as the basis for licensure weakens both the accrediting and licensing functions, as mentioned earlier. Until standards for licensing are developed that discriminate between qualified and unqualified professionals, it will not be possible to judge institutions by the quality of graduates produced. Yet to abandon efforts to judge qualifications of individuals seeking professional licensure, as NCATE urges, is to move in the wrong direction.

If national accrediting of teacher education programs is unworkable, what are the alternatives? Proposals range from accrediting by the federal government, accrediting by elitist groups of institutions with common interests, regional accrediting by organizations such as the present associations or the Education Commission of the States, accrediting by state departments of education, to no professional accrediting at all. The most promising suggestion, in my opinion, comes from Tim Stinnett, one of the founders of NCATE.[14] He proposes that accrediting become the responsibility of state departments of public instruction, with NCATE functioning as a national advisory body to project standards and criteria for judging institutional programs. Or, to expand on Stinnett's suggestion, NCATE could become a national accrediting agency to accredit state program approval operations. Such practice would provide: leadership to states; definitions of minimum standards to assure nation-wide excellence in programs for professional preparation; and an on-going national thrust for the improvement of professional programs. As a non-governmental agency, NCATE in the role of accreditor of state accrediting programs would be able to influence states to do a better job of accrediting than NCATE itself can now do.

The changed role for NCATE would require assurances of financial support. Such could continue to come from present constituent bodies and from state agencies that elected to use NCATE's services. The costs to NCATE would be decreased since it would be conducting only 50 accrediting operations, which might mean re-accrediting examinations every three to five years. States whose accrediting programs were approved by NCATE could award a type of national endorsement to institutions, an inducement that would encourage "voluntary" cooperation by state agencies.

What seems certain is that accrediting of professional education programs will increasingly become a state function. How it may be controlled in the future, the standards maintained, whether accrediting and licensing will continue to be treated as synonymous functions, the differentiation between excellence and mediocrity in preparation programs, and public acceptance of accrediting of professional programs--all may be determined by whether we are able to achieve cooperation, appropriate allocation of functions and shared accountability between national, regional, and state accrediting bodies and among groups concerned with the preparation of personnel. Maintaining NCATE as a national quasilegal body could provide a balance against excessive political pressures at the state level. Regional accrediting bodies have already demonstrated the ability to counteract undesirable local and state influences on schools and colleges. As a national accrediting board for state programs of accrediting, NCATE could gain public confidence and contribute significantly to the improvement of professional educational programs.

NOTES

1. In the field of education these two terms are used interchangeably. Actually, certification means to attest competence which involves professional evaluations and judgments; licensing is a legal process of issuing a permit to practice to individuals who have been properly certified.

2. John R. Mayor, Accreditation in Teacher Education: Its Influence on Higher Education, (Washington, D.C.: National Commission on Accrediting), 1965, p. 5.

3. American Association of Colleges for Teacher Education, Recommended Standards for Teacher Education, (Washington, D.C.: The Association), March, 1971.

4. A similar procedure is followed now in Canada.

5. The Association also published a longer list of "Recognized Colleges and Universities, beginning in 1913 and continuing until 1948.

6. The periodic ranking of departments and schools is a current example of elitism in classifying professional programs.

7. A number of accrediting agencies not approved by the National Council continue to function and new ones are being organized.

8. See Lindley J. Stiles and Jack Bils, "National Accrediting," in New Perspectives on Teacher Education, Donald J. McCarty, (ed.), (San Francisco: Jossey-Bass) 1973, pp. 118.

9. National Education Association, Teachers Can Change Teacher Education, (Washington, D.C.: The Association), August, 1975, p. 15.

10. John R. Proffitt, "Accreditation from the Federal Perspective," in Accreditation Issues in Teacher Education, published by ERIC Clearinghouse on Teacher Education, (Washington, D.C.: ERIC), July, 1975, p. 13.

11. See: United States District Court for the District of Columbia, Marjorie Webster Junior College, Inc. vs. Middle States Association of Colleges and Secondary Schools, Inc., Civil Action No. 1515-66; United States Court of Appeals, No. 23,351; and Supreme Court of the United States, October Term, 1970.

12. A key issue in this case was the charge that anti-trust laws were being violated. The Court of Appeals ruled that the Accrediting Association was not involved in interstate commerce; hence, no anti-trust violation was involved.

13. From the new NCATE Standards now in force.

14. T. M. Stinnett, "Thoughts About NCATE," The Journal of Teacher Education, (Winter, 1969), pp. 505-508.

CHAPTER 7

CERTIFICATION AND ACCREDITATION IN ILLINOIS SOME COMMENTS AND CONSIDERATIONS

W. Deane Wiley and S. Joseph Gore

In this paper, the authors review certification and program approval governance and procedural issues that they feel require clarification First, they discuss a number of factors viewed as having a significant impact on the development and reformulation of educational policy and the control over state certification and program approval procedures--a) declining enrollment in teacher preparation programs, b) growing demands for educational accountability, c) rising costs for meeting the eligibility procedures of state, regional,and national accreditation/program approval, etc. Special emphasis is placed on the recent creation of the Illinois State Board of Education and the change from an elected to appointed State Superintendent of Education.

Second, the authors suggest that two of the most significant objectives of a certification and accreditation study should be to a) develop mechanisms and processes for defining and monitoring educational standards and b) develop more efficient and valid/practical professional education program accreditation and certification standards.

The authors discuss state law and guidelines related to certification and program approval. Present problems associated with policy implementation are reviewed. Drawing on research on teaching effects, the authors assert that the teaching profession does not possess the knowledge requisite to achieve effective assessments of teacher qualifications. It is the authors' opinion that effective screening devices, needed to keep incompetent teachers from entering the profession, cannot be legally employed until specific criteria concerning competence are identified and valid/reliable standards delineated.

The authors identify a variety of political and economic forces which they feel have promoted movement toward competency and/or performance based teacher education. Further, the authors contend that competency based teacher education may be a useful research tool, but that present knowledge about the relationship between teacher behavior and pupil achievement is not sufficient to encourage legislation which would mandate competency based approaches to training.

Certification and Accreditation in Illinois
Some Comments and Considerations

W. Deane Wiley *
S. Joseph Gore **

Introduction

Bringing together yet another conference on certification and accreditation may cause some of you to have a strong sense of "deja vu." Certainly, many of the present conference participants have lived through and participated in the accreditation struggles which began in earnest with the formation of AACTE in 1948 and exploded with real severity in 1952 with the birth of NCATE. Despite the fact that we may in this conference need only note our current problems to relive some of this early history, the timing seems most appropriate to examine the promise, problems, failures and successes of accreditation processes and to examine their early connection with teacher certification. Certainly the timing is appropriate in Illinois for the variety of reasons set forth in the NIE proposal which led to this Phase I conference. As an introductory aside in regard to definitions, this paper does not accept the terms license and licensure as being synonymous with certification. Despite the comments of others[1] this paper is in concert with Kinney[2] who seems to provide a reasonably effective conceptual difference in the two terms. As a result, licensure is not what we are discussing in the strict sense.

---

* Dean, School of Education, Southern Illinois University

** Assistant Dean, School of Education, Southern Illinois University

Some Comment and Considerations

Not too long ago Calvin Gross noted, among major threats to teacher education as now carried on in colleges and universities, "...a potential challenge from the organized teaching profession to take over the control if not the function of teacher training..."[3] Yet another viewpoint: "Since federal and private foundation officials are unanimous in their view that schools of Education will neither change themselves radically nor bring about significant change in other educational institutions, the future is not hard to anticipate."[4] In Illinois, the Legislature, in the session just concluded, failed by two votes to approve legislation which would have literally placed the major teacher organizations in control of the Illinois Certification Board. Are we to believe that this move will be long delayed?

It is clear that a power struggle is underway with regard to the governance of mechanisms whereby teachers are admitted to practice and whereby teacher education programs are formally accredited. It is also clear that a power shift has already occurred in which classroom teachers have acquired a larger role in both certification and accreditation procedures. It seems inevitable, moreover, that teachers will become increasingly powerful in these regards, and that other participants, particularly universities and university professors, will become less so. Since policy issues regarding these two activities have been matters of controversy for some time, the recent power shift increases the seriousness and urgency with which they must be addressed as items of inquiry. The fact that none of the parties is yet satisfied with the state of affairs further enlarges the controversy and hence the imperative to seek informed solutions. Because the problems seem largely political in nature, the proposals for problem solution will probably be grounded within a political conceptual framework and stated in terms of political strategy. Nevertheless, a solution that is not shaped in accordance with an understanding of the limitations of any political strategy in this situation will prove a disservice to children as well as the education profession.

The limitations suggested here can be illustrated by referring to the first two objectives of the study proposed for this conference, namely:

1. To develop improved mechanisms and processes for defining and monitoring educational standards.
2. To develop more efficient and valid/practical professional education program accreditation and certification standards.

While the pertinent political questions cannot be avoided, the political answers will not necessarily improve standards of educational practice, nor of accreditation or certification procedures to prevent the entry of incompetent teachers into the profession until the profession approaches some specifics concerning competence. Margaret Lindsey observed in 1974 that it is imperative to redress the imbalance in participation between classroom teachers and the universities in the credentialing and preparing of teachers. She also warned that the political solution alone is not sufficient, particularly if the solution merely creates an imbalance in the other direction.[5] I would expand upon Lindsey's caveat to say that even if the political solution generated an even balance in participation, that alone would contribute little to what certification and accreditation are supposed to do: assure that access to professional practice is available only to properly prepared individuals. The reason for this pessimism is not that the participants could not be trusted to do their best nor that the proper controls could not be devised to assure that they did. It is simply that the profession lacks the knowledge base requisite to effective assessment of teachers' qualifications. That lack, and not the political resolution, is the fundamental problem. Therefore I submit that no matter what else this conference generates in the way of recommendations, we ought strongly to urge NIE to place its serious money in research on teaching. Until we know a good deal more about what good teaching is, it will make little difference who is in charge in terms of impact upon the quality of education. It will merely make the obvious political difference to the various participants.

Although the early sixties saw rising optimism about our capacity to establish a strong conceptual basis for teaching practice, the hope has not materialized. In 1967 Robert Schaefer could write provocatively about the school as a center of inquiry, in which the teacher was to be not only a skilled practitioner of the teaching art, but also an educational scientist as well. Unfortunately we know that the scholar-practitioner has not appeared on the scene, and that most of teaching practice is still intuitively rather than conceptually inspired. Foremost among the reasons for the absence of a coherent, definitive intellectual base for practice is the sheer complexity of the task. It is not that investigation has not gone forward; a good deal of work has been accomplished, but the total accumulation of relevant knowledge does not begin to close the gaps in our understanding of the relationships between teaching and learning. Bruce Joyce and Marsha Weil, for example, have provided us with an important and comprehensive delineation of conceptual models for teaching, which have emerged from some of the most significant research over the past couple of decades. What may be most significant about their work is their categorizing of models according to relatively distinct intellectual underpinnings, together with their careful avoidance of the formulation of a single comprehensive model. The evidence at hand compels agreement with the stipulation of Joyce and Weil, that for the present and much time to come, even teachers who seek a conceptual basis for practice will have to select what appears to be appropriate for the occasion, and then will probably have to adapt the model selected.

The knowledge gap itself is related to other developments which I think more directly reflect the manner in which political factors interact with the intellectual. The optimism that many of us shared with Schaefer in the early and mid-sixties was sponsored as much by promising national policy as by scientific progress. The government had begun pumping unprecedented amounts of money into education, including educational research, although support for the latter remained relatively small. Probably most of us recognized that the federal activity in behalf of education was essentially a political response to a political crisis--the crisis of urban and racial poverty. The educational programs did not emerge from systematic inquiry and strong research evidence about education. They resulted from predictable legislative response to political trauma--trauma like Detroit and Newark. Some researchers did in fact observe that the "compensatory" programs lacked evidential support, and that the profession was not very well prepared with macrosystem research techniques. Even if we had been, evaluation components were invariably lacking or post hoc. Nevertheless, the stimulus of federal dollars plus the desire to win part of the New Frontier and create the Great Society sustained a sanguine ardency, combined with some confidence that we were really making some scientific progress.

Perhaps really significant gains might have been accomplished, even under the above conditions, had it not been for the unsurprising failure of the federally sponsored activities to demonstrate immediate success, either politically or educationally.

Still another illustrative example is the set of circumstances associated with competency based teacher education. There again we see political and economic pressures converging upon the educational enterprise in a manner which promotes a particular approach to the solution of educational problems. CBTE is an example of a concept intruded into education from other domains, principally systems engineering. In part its adoption in education reflects our historic dependence upon external intellectual sources, usually from the social sciences. In this case, however, the alacrity with which educators attached themselves to the new instrument was greatly intensified by other impulses. This refers of course to the economic milieu in which the public has revolted against increasing educational costs in a period of recession. The fiscal crisis has been reinforced by a seemingly national impression that schooling is ineffective. The climate has demanded accountability, and no other scheme since the efficiency movement of sixty years ago has presented itself so propitiously as the educational panacea. Moreover, while some may believe that the competency mode is inappropriate in education, others accept it as the benchmark of 20th century educational science. Even among the enthusiasts, however, there has generally been acknowledgement that the definition of teaching competence has only just begun. While it might be a useful research tool, what is presently known about competence scarcely constitutes an adequate basis for assessing teacher qualifications or performance. To those who hold this view nothing could be more disastrous than to mandate competency based teacher education as the basis for program accreditation or certification and from that viewpoint no mixture of participants, no matter how perfectly balanced, would mitigate the disaster.

In view of the inevitability of the interaction between the political and intellectual interests, it might be tempting to dismiss the governance of certification and accreditation as irrelevant. Especially since the intellectual base of practice remains so resistant to consensus, why indeed should the political question be terribly important? One might agree with Harold Taylor, who argues that we have taken the whole apparatus of certification and accreditation too seriously. We come eventually to think of certification, he insists, in essentially negative terms, so that the concept "narrows the range of educational discussion into a set of details essentially unrelated to education itself."[6] Since the fundamental questions about teacher preparation cannot yet be answered, perhaps it would do just as well to take a more relaxed view, and let governance go its own existential way. The problem with that course is that the political interests--and everyone of us is associated with one or more--will persist in directing governance in the direction of particular ends. Besides that, the "unrelated details" may grow from irrelevant nuisances to serious impediments. There are those who believe that the competency mode is unrelated to real education, but when it becomes written into state law as the basis of school accreditation and program approval, it becomes disconcertingly relevant.

Having accepted the public politics of policy as an unavoidable agenda, the possible range of alternatives must then be explored. Who are the legitimate participants; in what proportion should each be represented; at what levels of governance? If we identify the right participants in the right proportions, will decision-making be enhanced? To return to the objectives of the proposed study, will the "right" political arrangement improve the definition of educational standards, and result in more effective certification and standards and accreditation standards? What are the ingredients of an "effective certification?"

To a major extent the validity of policy decisions is determined by the empirical function of what happens to them in subsequent political events. Witness the fate of CBTE in Texas. Its defeat was a political one, relatively independent of what is known or unknown about teaching competency. Educational researchers and theorists may look upon Texas HB1238 as a victory or defeat, depending upon their scientific persuasions. Nevertheless, to the opponents of CBTE, its legislative defeat in Texas must not only appear to be right, but also to confirm the inevitable strength of science. From another point of view, the reversal may only demonstrate the instability of educational policy in the present milieu.

Certification

For many years Illinois has operated three certification systems, rather than one. Some teachers obtain their certificate by completing an approved teacher education program at one of more than sixty institutions in the state. A second group--in the past the great majority--

receive certificates through the process of individual transcript evaluation without institutional approval. During the 1960's an effort was begun to establish the approved program system as the preferred mode, with the expectation that by the 1970's at least 90 per cent of the teachers receiving certificates would have completed approved programs. By 1972, however, of 34,000 certificates issued, only 13,000, or about 38 per cent, were based upon completion of approved programs. Supporting material for Superintendent Cronin's 1975 legislative program indicate that the record has improved to only 55 per cent. A third group receive their credential from the Superintendent of Schools in the City of Chicago. According to Ms. Susan Bentz,[7] "One can teach in Chicago but not in Evanston or Oak Park or vice versa."

The realities of a political situation which generates such phrases as, "Just outside Chicago, there's a State called Illinois," offers little of merit in the creation of solutions for all of the school systems in Illinois. Yet, the Illinois Legislature (much like that in California and New York) continues to deal with specialized legislation addressed to "cities of 500,000 population or more..." a phrase whose familiarity to many of you is only slightly altered by the size of the number inserted.

The proposed purpose of all of these routes to certification is to protect the rights and interests of school children, parents and prospective teachers,and the general welfare of the state. To some very minimal extent a system of certification may provide these protections. Yet on the face of it the protections do not seem to be sought by the various clients. Thousands of students in Illinois, as in other states attend school in a private sector which is essentially exempt from the credentialing process. This attendance is sought after by large numbers of parents who pay for the right not to be "protected" by certification. One must ask how seriously the state itself takes such promised safeguards when the legislature continues to condone the three-avenued approach set forth above. In Illinois one sees the spectacle of one arm of the Illinois Office of Education issuing a credential on the basis of statutory credit hour minima while another statutory advisory body to the Illinois Office of Education (The State Certification Board) demands more and more rigor in those university programs filed for credentialing through entitlement! Given the lack of concern for safeguards evidenced by the facts of credential issuance in Illinois the forced conclusion is that to little or no extent does the present system of accreditation protect the various interests to which rhetoric is so often addressed. There is some evidence[8] that the supposed relationship between quality and minimum standards leading to a teaching credential is actually non-existent as quality is functionally determined at the school level.

Accreditation

If one interchanges the phrase "certification process for teachers" used above with "accreditation processes for institutions" very similar conclusions seem possible. The use of the term voluntary in relation to regional and national accreditation seems at best wry humor. Neither the North Central Accreditation nor the NCATE accreditation are really voluntary to any practical extent. Neither is the Illinois program approval process unless a school wishes to be reduced to offering a variety of courses which cannot lead to certification by entitlement.

In fact, if one's students are not to suffer unduly in the reciprocity area, NCATE becomes mandatory.

In fact, if one would offer a unified teacher education program leading to approved program entitlement for students, the state program is mandatory.

In fact, without North Central (or regional accreditation) most, if not all of the professional accreditating organizations assume no basis for their accreditation.

There seems to be little real interaction in Illinois between state processes and NCATE processes, aside from a one-way sharing of personnel, i.e., the NCATE team usually has an IOE official but the IOE team does not have an NCATE representative. The following questions are among those which need to be generally addressed in the process as it affects the university:

1. Costs continue to mount for the massive self-studies required by accrediting organizations. This cost is fundamentally in time taken away from other, possibly more worthy, pursuits in the professorial scheme of things. At a time of shrinking teacher enrollment and rising faculty costs what can be done to reduce cost and time-cost of professorial talent?

2. What interactions should there be between NCATE and the state approval process? Perhaps NCATE should be removed from the local accreditation task and simply monitor and certify state processes? This would be of tremendous relief to the local institution in terms of cost and time.

3. Wide adoption of the model bill covering reciprocity sponsored by the New York State Education Department may signify no further need for NCATE to be directly involved in local accreditation. Some thirty-five states have now passed this bill providing for legal and formal agreements to accept the certified graduates of one another.

> If in fact, a fundamental purpose for creating NCATE was to build national confidence in its accredited members, that purpose may no longer need to be served.

A brief review of the Illinois State process seems to indicate a growing sophistication which again may argue against the continuance of NCATE accreditation at the local level.

In the absence of a board of education, and with the tenure of the superintendent subject to the changing winds of partisan politics, the state office has in the past exerted a relatively weak influence. Prior to the tenure of Superintendent Bakalis, the state office had engaged in occasionally perfunctory reviews. These took the form of a chummy excursion led by the executive secretary of the certification board who gathered together a couple of staff members from OSPI and two or three university professors to spend a friendly afternoon on the campus of the institution to be examined. The visits were enlightened by descriptive documents prepared by the institution along OSPI guidelines. Inquiry on the part of the examiners was seldom probing, and there was no expectation that the various programs, already on file and thus approved, would be jeopardized. Since NCATE accreditation was a prior condition for state approval, NCATE institutions were generally secure from any serious threat from the state.

During the tenure of Superintendent Bakalis, however, OSPI undertook the development and implementation of a program approval process that promised to be both more systematic and consequential. In March, 1973, Mr. Bakalis and other OSPI personnel met with university representatives to examine the draft copy of a procedures manual under which program approval was to occur. In October, 1973, a revised version was instituted on a twelve-month "field test." On March 21, 1975, IOE published the present edition of the manual. The evolution of the procedures as outlined in the manual reflects some significant characteristics of the recent governance of teacher certification and program approval in the State of Illinois.

The conferees attending the March, 1973, meeting found that there were really two agenda: one was consideration of the proposed manual, together with the procedures it embodies and their implications for the institutions involved; the other was the consideration of competency-based teacher education. In addition to arranging for OSPI staffers to explain the procedures of program approval, the superintendent's office had employed consultants to present information about competency-based teacher education. The double agenda generated some confusion and not a little apprehension among the university representatives. Although the extent to which competency-based criteria would govern program approval remained unclear, many participants viewed the simultaneous presentations as a signal that it was to be installed as the overarching factor. While a number of university people favored the pursuit of the definition of competence, the majority seemed opposed to specifying CBTE as the basis for program approval.

The initial point to be made here is that OSPI seemed to be responding to influences external to the profession and the profession's knowledge about teaching competence. However, while the field-test version of the procedures manual retained references to competency training, it was much less emphatic than the original. In fact the preface included the disclaimer, "This Manual does not mandate a specific kind of teacher education program." The introduction to the present edition concluded with the following paragraph:

> The Manual does not embrace a particular method of preparing teachers. Use of the term "objective" for example, is not intended to suggest that institutions are expected to use behavioral formats or terminology for reporting information. The Manual clearly recognizes the importance of institutional freedom in designing and operating teacher education programs.[9]

The former weaknesses of the state office in the area of program approval have all come to light as development has continued. For example, the field-test version indicated that the state program approval system would serve to eliminate "serious overlap and duplication of effort in producing reports and in preparing site visits by review teams." Yet in the view of some university people the lack of coordination and the persistence of duplicated effort are precisely the most distinctive characteristics of the procedures implemented in accordance with the program approval plan. Not only are the report materials themselves highly duplicative of NCATE reports, but the proposed cycle was not observed at the outset, with some institutions being required to develop a periodic review report and in some cases undergo on-site visitations only one, two, or three years after completion of an NCATE review. The frequency with which institutions must attend to state, NCATE, and other agency reports has finally begun to actually hamper efforts to address the problems disclosed by any given agency.

In its continued evolution the present manual eliminates the various tables, forms and format directives that characterized the earlier version. Illinois Office of Education staffers will now work individually with each institution in the preparation of its review report. This is a welcome change, and should greatly facilitate the work of both the institution and the state office. Nevertheless, so far as I know, the schedule remains the same. At Southern Illinois University, this means that this year we must prepare for North Central accreditation, next year for NCATE, and the following year for Illinois Office of Education.

At least one among the policy issues for this conference's consideration is an examination of the worthiness of a schedule like the one stated. Given some programmatic dynamics what does a visit every ten years mean in terms of some mythical concept of protection that might be felt by the public? While most everyone seems to know that "losing one's accreditation" is bad, most find it difficult to go beyond that. There is a general sense of worry in the university community concerning achievement of accreditation but not much rationality brought to bear on this worry. To institution X it may mean the loss of sizeable amounts of federal funds--on the other hand one can lose the same funds by being properly accredited and refusing to set up an athletic department for women. While the former seems the greater worry the effect is the same. Loss of accreditation might mean a "loss of prestige." To a regional university not competing on a national level (and this would include the larger number of institutions), loss of prestige might be a minimally important factor.

During the span of a ten year visit entire programs might come and go. Departments rise and fall in leadership strength, budgets ebb and flow from program to program. It seems a reasonable question as to whether monitoring in decades can serve any useful function to any of the constituencies who supposedly benefit from the accreditation concept.

Coming again to the proposed protection of public interest against the unqualified or the diploma mill, the case seems shaky at best. Given no diminution in the number of agencies and the real lack of agency interaction, where is the public interest if an institution achieves a ten-year approval from NCATE and fails to have its program approved by a state certification board whose motivation is simply to reduce the number of teacher preparation institutions in the state? It is possible to be totally approved by the state and yet fail to receive better than five year NCATE approval. What is this message for the public welfare? How do the myriad constituencies even receive formal notice of the action? What does the action mean when it occurs (with NCATE) only once in ten years? Pending serious attention to these questions, the state program approval process would seem to make its case the best. The constant interaction available to both the state department and the institution would seem to make tinkering on an "as needed" basis, the more viable monitoring device to protect the publics under consideration.

Legal, Political and Governance Comments

There are a number of legal, political and managerial issues surrounding accreditation and certification that bear exhibition as free-standing issues despite their highly interrelated nature. As examples, the following are more illustrative than exhaustive:

> Item: In the absence of specific legislation, the governance relationships between the State Superintendent of Education and the State Certification Board continue to be unclear. "In consultation with..." is not a definitive base upon which to build either a program approval system or a teacher certification system. The fact is that voted decisions of the Teacher Certification Board have the force of law in areas like credential denial. Yet the Board is occasionally defined as only advisory to the Superintendent when the latter is at odds with the recommendation of the Board. When the State Superintendent was a constitutionally

elected officer this advisory stance may have found more legal sanction than the present situation where the Superintendent is not a constitutional officer. In any case the political power of the IEA and the IFT will continue to be felt with increased force as to the constituency of the Certification Board. Their case continues to be a most logical and persuasive one to many legislators. This, coupled with their increasing political action arm literally forces a consideration of not, "What if..." but "How, when..."

Item: Governance problems are not so simple as to be contained only in the foregoing example. Until a year ago, Illinois did not have a board of education, and the superintendent was elected as either a democrat or republican. A fifteen-member School Problems Commission functioned as an advisory group to the education committees in the General Assembly. Ten commissioners were legislators (five from each House) with the majority and minority parties represented accordingly on a 3-2 ratio. The other five members were appointed by the governor. Thus despite the mythical divorcement of education and politics, which in American folklore, says Iannacone, are two "immaculately untouching worlds," education in Illinois was literally and deeply imbedded in state politics. The commission established a reputation for avoiding controversial issues, leaving them to the house and senate education committees. A consequence of this educational governance structure was an historical absence of strong leadership on the part of the superintendent and state department (Office of the Superintendent of Public Instruction.) Prior to January 13, 1975, the School Problems Commission was in fact the "School Board" in Illinois. While it has historically dealt primarily with the finance issue, its impact on all school legislation has been significant and meaningful.[10]

Recent constitutional revisions established a State Board of Education in Illinois. The duties of this Board are essentially stated as (it) "...shall encompass all duties currently delegated to the Office of the Superintendent of Public Instruction and such other duties as the General Assembly shall designate."[11] The School Problems Commission (a creation of the Legislature) has not disappeared with the creation of the State Board. When questioned about its place in the educational scene, a source close to the School Problems Commission made the following statement to this writer, "The history of state boards has been one of weakness. We're going to watch this new board very closely. If they turn out to be a strong board, we'll work with them, if they turn out to be weak, we're very much in business." Note that in any case, weak or strong, this commentator had no expectation that the School Problems Commission is going to be phased out, or weakened in any way. The governance of Illinois education generally and certification and program approval processes specifically cannot properly be addressed without realizing the potential for mischief which exists in the above situation.

Item: In yet two additional areas, governance is further confounded by both legal and political considerations. First, consider the fact that all budgets and degree program approval for teacher education in Illinois derive from the State Board of Higher Education. Until the recent creation of the State Board of Education, the only formal interaction was one seat on the Board of Higher Education held by the State Superintendent of Public Instruction. The legislation creating the new State Board of Education also created the six-member joint-committee between the two Boards to "...develop policy on matters of mutual concern..." It remains to be seen whether this committee can ameliorate the recent past when the Board of Higher Education *mandated* a ten per cent reduction in teacher education, the immediate phasing out of the entire School of Education at the Chicago Circle Campus, the immediate cessation of all "*required*" physical education programs at the collegiate level and some other rather whimsical pronouncements concerning teacher education. This was, to the best of my knowledge, carried out with little or no information from or to the State Education Office. This same Board of Higher Education recently received a report from its task force on Teacher Education which again virtually ignored the existence of the state education agency.

Item: Of the many governance issues the last for this paper deals with the relationship of the State Board of Education to the executive branch of government and some commentary on the role of the regional superintendents. It is still very early to decide whether in fact the new Board of Education can play the role expected of it by many. Namely, not to remove politics from education (as too many think is actually possible), but rather to be involved in the politics of education in those ways which have the greatest promise for the educational sys-

> tems in the state and thereby the children of the state. After six months in business, the Board, in the judgment of many has not yet found a firm footing to withstand some rather severe tests with the state Executive. Time should provide a better view of this vexing problem, but at present it appears unresolved. The regional superintendent's role in certification is both time honored and anachronistic.

There are presently more than 108,000 classroom teachers in Illinois who trek to the regional superintendent's office each year and pay a two-dollar fee to "register" their credential. They do this even though they have spent their entire career in the same school and the same service region. If they are making their "initial" request for a credential, this fee is $3.00. These monies are used in turn for mandatory regional teacher institutes for the teachers who paid the fee in the first place. It is suggested that any reasonable evaluation of these institutes may provide the basis for more productive use of these funds. This evaluation may even provide the basis for a thorough study of the role of the regional office in the governance of the certification process.

Summary

One of the purposes of this paper has been to attempt brevity as well as exposition of the issues. The two are in opposition, at least when discussing Illinois. While highly salient issues may be absent as a result of ignorance, others have been omitted in the expectation that they will nevertheless become policy areas for this conference's attention. For example, the relationship between standards for certification and standards of accreditation can be a lengthy topic. Haberman and Stinnett[12] devote sixty-eight printed pages to an analysis of NCATE standards alone. The State Board of Education recently received a legislative study package of over forty pages dealing only with certification standards and problems. Many of the latter were addressed to the governance issues in Chicago, only briefly mentioned in this paper. The problems surrounding the regional superintendent's role in Illinois educational governance are certainly of greater depth and severity than the illustration of the financial lug on the credential process. Finally, the emerging role of the State Board of Education and its placement in the governance pantheon of Illinois certainly should receive the close attention of this conference as it sets about the tasks defined.

NOTES

1. Haberman, Martin, and Stinnett, T. M., *Teacher Education and the Profession of Teaching* (Berkeley: McCutchan Publishing Corp., 1973), p. 17. While acknowledging that licensure and certification are technically distinct, Haberman and Stinnett nevertheless use the terms interchangeably.

2. Kinney, L. B., *Certification in Education* (Englewood Cliffs, N.J.: Prentice Hall, Inc.), p. 131.

3. Calvin Gross, *Drumbeats and Dissonance: Variations on a Theme for Teachers*, Sixteenth Annual Charles W. Hunt Lecture (Washington, D.C.: AACTE, 1975), p. 16.

4. Haberman and Stinnett, *Teacher Education*, p. 257.

5. Margaret Lindsey, *Ferment and Momentum in Teacher Education*, Fifteenth Charles W. Hunt Lecture (Washington, D.C.: AACTE, 1974), p. 20.

6. Harold Taylor, *The World and the American Teacher*, (Washington, D.C.: AACTE, 1968), p. 200.

7. Susan K. Bentz, "Basic Concerns of the O.S.P.I. for Teacher Education and Certification," in *Proceedings of the First Annual Conference on Teacher Education* (Springfield, Illinois: O.S.P.I., 1973), p. 8.

8. In the mid 1950's California had three teaching credentials available which affected 7-8-9 junior high school organization. Its elementary credential allowed the holder to teach in grades 7 and 8. The secondary credential allowed teaching in only grade 9, while the junior high credential allowed teaching in grades 7-8-9. A study sampling more than 30 schools, which tested the principal's rating of effectiveness against the type of credential held found no statistically significant relationship between teaching effectiveness as rated by the principal and type of credential held.

9. *A Manual for Procedures for Approving Illinois Teacher Education Institutions and Programs*. (Springfield, Illinois: Illinois Office of Education, 1975), Introduction.

10. Nicholas A. Masters, Robert H. Salisbury, and Thomas H. Elliot, *State Politics and the Public Schools* (New York: Alfred A. Knopf, 1964), ch. 2.

11. HB 661, 1972-73 Legislative Session, Illinois General Assembly.

12. Haberman and Stinnett, *Teacher Education*, pp. 181-249.